

Foreign financing of Islamic institutions in the Netherlands

A study to assess the feasibility of conducting a comprehensive analysis

Stijn Hoorens, Joachim Krapels, Magda Long, Tom Keatinge, Nicole van der Meulen, Kristy Kruithof, Jacopo Bellasio, Anna Psiaki and Gursel Aliyev

RAND EUROPE

RAND EUROPE

Foreign financing of Islamic institutions in the Netherlands

A study to assess the feasibility of conducting a comprehensive analysis

Stijn Hoorens, Joachim Krapels, Magda Long, Tom Keatinge,
Nicole Van der Meulen, Kristy Kruithof, Jacopo Bellasio,
Anna Psiaki, Gursel Rafig Aliyev

Prepared for Ministry of Security and Justice, Research and Documentation Centre (WODC)

For more information on this publication, visit www.rand.org/t/rr992

Published by the RAND Corporation, Santa Monica, Calif., and Cambridge, UK

Preface

As specified in the *Motie Segers*, the Dutch Parliament formulated a need to provide an overview of the size and scope of foreign financial support to Islamic institutions in the Netherlands, as well as the potential influence that foreign actors may exert (partly) as a consequence of this funding. In the face of the complexity of this delicate undertaking, the Research and Documentation Centre (*Wetenschappelijk Onderzoek- en Documentatiecentrum*, WODC) decided that a staged approach would be best suited, commencing with an assessment of the feasibility of a comprehensive estimate of foreign funding to Islamic institutions (Phase 1). Depending on the results, Phase 1 would be followed by a detailed and comprehensive estimate in Phase 2 and an assessment of influence in Phase 3. On the 1st of June 2014 RAND Europe was commissioned to undertake Phase 1 of this staged approach.

In this document, we report on the methodology, results and findings under Phase 1. The report explains the legal, cultural and historical context of Islamic institutions in the Netherlands and provides a generic overview of the basics of funding in Islam. The study team has taken a systematic and thorough approach to surveying the data available on these types of institutions in the Netherlands and in potential source countries. Information is often inconsistent, not always reliable, hard to find or confidential, but this report includes exhaustive reporting of such data, or lack thereof, as transparently and systematically as possible. Finally, we draw conclusions about the feasibility of a comprehensive assessment regarding the size, scope and conditions of foreign funding of Islamic institutions in the Netherlands. In addition, we make several final recommendations.

RAND Europe is an independent not-for-profit policy research organisation that aims to improve policy and decision-making in the public interest through research and analysis. This report has been peer-reviewed in accordance with RAND's quality assurance standards. For more information about RAND Europe or this document, please contact:

RAND Europe
Rue de la Loi 82
Brussels 1040
Belgium
Tel. +32 2669 2400

RAND Europe
Westbrook Centre, Milton Road
Cambridge CB4 1YG
United Kingdom
Tel. +44 1223 353 329

Table of Contents

Table of Boxes

Tables of Tables

Samenvatting

De afgelopen jaren zijn er geregeld zorgen geuit door de overheid en de politiek omtrent de financiering van moskeeën vanuit het buitenland. De aandacht hiervoor wordt aangewakkerd door rapporten van inlichtingendiensten en berichtgeving in de media over de realisatie van nieuwe grote moskeeën in Nederland, die mede mogelijk wordt gemaakt door financiering uit het Midden-Oosten. De zorgen richten zich met name op de mogelijkheid dat financiering onder bepaalde voorwaarden kan worden verleend, waardoor deze buitenlandse actoren bijvoorbeeld invloed zouden krijgen op het bestuur, de organisatie en de religieuze leer van deze moskeeën. Daarbij bestaat het risico dat dergelijke invloed in strijd is met de waarden van de democratische rechtstaat.

Afbakening en doelstellingen

Over de omvang en de aard van buitenlandse financiering aan religieuze instellingen kan enkel worden gespeculeerd. Dit wordt niet centraal bijgehouden en er is geen registratieplicht voor dergelijke schenkingen. Er is dan ook weinig bekend over de herkomst van inkomsten van moskeeën in Nederland, waardoor het moeilijk vast te stellen is of deze zorgen terecht zijn. In de Motie Segers heeft de Tweede Kamer daarom gevraagd de omvang en de aard van de financiële steun aan Nederlandse moskeeverenigingen en andere organisaties in kaart te brengen.

Vanwege de complexiteit van het onderzoek en de onzekere beschikbaarheid van gegevens heeft het Wetenschappelijk Onderzoek- en Documentatiecentrum (WODC) in haar startnotitie dit onderzoek opgezet in drie deelonderzoeken. Het eerste deelonderzoek betreft een haalbaarheidsstudie die tot doel heeft de uitvoerbaarheid vast te stellen van een grootschalige studie naar de aard en omvang van buitenlandse financiering aan islamitische instellingen in Nederland, alsmede de eventueel daarbij gestelde voorwaarden. Dit document rapporteert over de resultaten van deze haalbaarheidsstudie.

De startnotitie stelde dat het onderzoek zich dient te concentreren op moskeeën en moskeeverenigingen en een tweetal hoger onderwijsinstellingen. De aandacht richt zich hierbij vooral op potentiële financiering door buitenlandse overheden of daaraan gerelateerde actoren, waaronder centrale fondsen. Hoewel de studie zich niet beperkt tot gegevens in het publieke domein, zullen deze data een eerste ijkpunt vormen in het beoordelen van de haalbaarheid van een uitgebreide inventarisatie. Waar mogelijk en aanwezig, hebben wij bovendien toegang gevraagd tot vertrouwelijke informatie om de analyse aan te vullen.

De context van buitenlandse financiering aan religieuze instellingen

Uit de achtergrondliteratuur blijkt dat moskeeën in Nederland zich meestal organiseren in de vorm van verenigingen en stichtingen. Naast de flexibiliteit die deze rechtspersonen bieden, is het aantrekkelijk dat deze rechtspersonen eenvoudig kunnen worden opgezet. Er is weinig extern toezicht op stichtingen en verenigingen en dit, gecombineerd met de constatering dat Islamitische organisaties onder een vergrootglas liggen sinds de gebeurtenissen op 11 september 2001, lijkt een remmende werking te hebben gehad op financiële transparantie bij islamitische instellingen. Externe financiering voor stichtingen en verenigingen – al dan niet van religieuze aard – is gangbaar in Nederland en daarbuiten. Ondanks dat donaties vanuit de gemeenschap een belangrijke rol spelen, is het onwaarschijnlijk dat grote projecten, zoals een verbouwing of nieuwbouw van een gebedshuis, uitsluitend door de lokale geloofsgemeenschap kunnen worden bekostigd. Aangezien overheidsfinanciering niet beschikbaar is, zijn grote externe donaties dan haast onvermijdelijk. Er is derhalve weinig twijfel dat dergelijke financiering, bijvoorbeeld door buitenlandse overheden, aan moskeeverenigingen bestaat.

De Islam is niet de enige religie met een sterke filantropische traditie. Religieuze liefdadigheid (*Zakat* voor moslims) speelt eveneens een belangrijke rol in andere geloven, zoals het hindoeïsme (*Daan* of *Seva*) en het christendom (aalmoezen). Echter, westerse landen zijn historisch gezien eerder donor dan ontvanger geweest voor religieuze liefdadigheid. Financiering aan religieuze (niet-moslim) diaspora's in westerse landen blijkt niet gangbaar. Dit onderzoek heeft weinig bewijs opgeleverd van financiering door buitenlandse overheidsinstellingen aan andere religieuze gemeenschappen in westerse landen. Bovendien hebben we geen enkele aanwijzing gevonden van een structureel beleid ten aanzien van de financiering van instellingen (in plaats van groepen of individuen) in het buitenland. Deze bevindingen lijken te bevestigen dat financiering door buitenlandse overheidsinstellingen en daaraan gelieerde fondsen aan westerse religieuze instellingen vaker voorkomt in de islamitische gemeenschap dan bij andere religies in Nederland.

Methodologie

Naast een uitgebreide bestudering van de beschikbare documentatie en literatuur over dit onderwerp, alsmede een aantal inventariserende interviews, hebben we voor een quasi-experimentele aanpak gekozen om de beschikbaarheid en relevantie van informatie te testen. Deze aanpak bestond uit twee onderdelen:

1. Een systematische en omvattende audit van beschikbare data over islamitische instellingen in Nederland, die inzicht kunnen geven over de omvang en aard van buitenlandse financiering en mogelijke invloed. Deze informatie is voornamelijk afgeleid uit publieke bronnen, zoals het Handelsregister van de Kamer van Koophandel, het Kadaster, gemeentearchieven, de Douane, rechtszaken, online bronnen, maar ook uit enkele vertrouwelijke documenten die ons ter beschikking zijn gesteld.
2. Een systematische en omvattende audit van publiek toegankelijke bronnen in zes potentiële financierende landen op mogelijke indicaties van financiering van islamitische instellingen in Nederland.

Bij het raadplegen van deze bronnen hebben we ons geconcentreerd op twee steekproeven uit een lijst met 355 islamitische instellingen in Nederland. De eerste 'doelgerichte' steekproef (n = 19) bestond uit

moskeeën en onderwijsinstellingen geselecteerd uit een pool van instellingen die om uiteenlopende redenen in de media of in onderzoeksrapporten worden genoemd. In deze eerste steekproef zijn instellingen opgenomen waarin op basis van deze berichten bovenmatige interesse is geuit in het kader van dit onderzoek. De tweede steekproef (n = 20) bestond uit een controlegroep van random geselecteerde instellingen. Vervolgens is de in Nederlandse bronnen verzamelde informatie met indicaties van de aanwezigheid of afwezigheid van buitenlandse financiering getrianguleerd met informatie die daarover in de financierende landen is verzameld.

Ondanks de garantie dat de organisaties en individuen anoniem konden blijven en dat de informatie vertrouwelijk kon worden behandeld bleken verscheidene organisaties en individuen terughoudend bij het verlenen van medewerking aan het onderzoek. De gebrekkige beschikbaarheid van gegevens heeft de uitvoering van dit haalbaarheidsonderzoek gecompliceerd. Niettemin worden hieronder de belangrijkste bevindingen en conclusies van het onderzoek weergegeven door de beantwoording van de onderzoeksvragen.

De aard en omvang van buitenlandse financiering

We hebben de beschikbare informatietypen en gegevens over buitenlandse financiering geïnventariseerd en beoordeeld of het mogelijk is om op basis hiervan de aard en omvang van deze financiering van de gehele sector in kaart kan worden gebracht.

Welke informatie is beschikbaar in Nederland over de aard en omvang van buitenlandse financiering van islamitische organisaties door statelijke actoren in het buitenland?

Uit de beschikbare documentatie is bekend dat er officiële links bestaan tussen bepaalde moskeeën in Nederland en buitenlandse overheden (bijvoorbeeld Turkse Diyanet moskeeën) of internationale organisaties (bijvoorbeeld Milli Görüş moskeeën). Echter, de documentatie die over deze organisaties voor dit onderzoek is verzameld biedt geen overkoepelend inzicht in de omvang van deze geldstroom uit Turkije naar instellingen in Nederland. Indicaties van buitenlandse financiering aan instellingen in Nederland, zoals gerapporteerd in rapporten of in bronnen op internet, konden in een aantal gevallen worden geverifieerd met gegevens uit publieke en in vertrouwelijke bronnen (zie tabel hieronder).

Tabel S.1: Overzicht van geraadpleegde informatiebronnen: aard en omvang van financiering

Informatiebron	Gegevens beschikbaar?	Ten aanzien van religieuze instellingen, verschaft het informatie over:	
		Concrete indicaties van buitenlandse financiering?	De omvang van buitenlandse financiering?
Kadaster	Ja	Ja, via hypotheken	Nee
Online beschikbare Jaarverslagen	Ja, maar slechts voor enkele instellingen	Nee	Nee
Douane: aangifte van contanten	Ja	Nee	Nee
Gemeenten: bouw-/omgevingsvergunningen	Ja	Ja	Ja, in een enkel geval
Politiegegevens	Geen toegang verkregen binnen de looptijd van deze studie	*Niet beschikbaar*	*Niet beschikbaar*
Dossiers van het Openbaar Ministerie	*Niet geanalyseerd*		
Rechtszaken–(Rechtspraak.nl)	Ja	Ja	Nee
Online beschikbare informatie	Ja	Ja	Nee
Diplomatieke bronnen	Nee, maar we zijn op de hoogte gebracht van correspondentie tussen het Ministerie van Buitenlandse Zaken en de ambassade van een financierend land	Ja	Nee, slechts in één specifiek geval werd een bedrag genoemd
Rapporten van politie- en inlichtingendiensten	Ja, we hebben inzicht gekregen in de bevindingen van één FIU rapport na het tekenen van een geheimhoudingsverklaring	Ja	Ja, in enkele gevallen

Toegang tot politiegegevens werd niet verleend binnen de looptijd van deze studie. Als gevolg hiervan zijn we niet in staat geweest deze gegevens te analyseren en om deze vervolgens te koppelen aan dossiers van het Openbaar Ministerie.

Is het op basis van de beschikbare informatie mogelijk om de omvang en aard in kaart te brengen van financiering door buitenlandse overheden aan islamitische instellingen in Nederland?

Met de verzamelde gegevens is in enkele gevallen buitenlandse financiering aan individuele instellingen in de steekproef aangetoond. In de meeste gevallen werd over deze financiering al in de media gerapporteerd. De gegevens verschaffen echter niet voldoende informatie om een betrouwbare inschatting te maken van de totale omvang en aard van buitenlandse financiering voor de steekproef. Uit de literatuur blijkt dat informele transacties en contante betalingen een belangrijke rol spelen in het financiële verkeer tussen islamitische organisaties. Er is weinig transparantie bij islamitische instellingen over de aard en omvang van deze betalingen. Bovendien hebben we geen toegang gekregen tot cruciale informatie over (girale) financiële transacties. In individuele gevallen kon de aanwezigheid van buitenlandse financiers worden geverifieerd met behulp van, bijvoorbeeld, informatie over eigenaren en hypotheekhouders uit het

Kadaster. Deze methode biedt echter weinig houvast voor het in kaart brengen van de inkomsten van alle islamitische instellingen in Nederland.

Bovendien moeten we voorzichtig zijn met extrapolatie van de bevindingen over de steekproef naar de gehele populatie van islamitische instellingen. De verschillen tussen de 'doelgerichte' steekproef en de random steekproef lijken erop te duiden dat het deel van de moskeeën dat regelmatig in de media wordt genoemd niet representatief is voor alle moskeeën in Nederland. Tot deze groep behoren bijvoorbeeld enkele instellingen met recente nieuwbouwprojecten of – plannen die extra financiering vereisen. In vergelijking met instellingen die regelmatig in de spotlights staan, zijn er voor moskeeën in de random steekproef nauwelijks indicaties gevonden die duiden op buitenlandse financiering.

Wat zou de betrouwbaarheid zijn van schattingen over de omvang en de aard van buitenlandse financiering aan islamitische instellingen?

De variabele kwaliteit van gegevens beperkt de mogelijkheid om harde conclusies te trekken uit het beschikbare materiaal. Hoewel informatie uit publieke bronnen relatief betrouwbaar is, waren de data voor instellingen in de steekproef regelmatig incompleet. Bovendien is er slechts beperkte transparantie over de inkomsten, uitgaven, activa en passiva van deze instellingen. Zo hebben we maar voor één van de 39 instellingen in de steekproef een jaarverslag kunnen vinden in het publieke domein. Dit jaarverslag bevatte overigens geen informatie over donaties.

Indien een omvattende inventarisatie van buitenlandse financiering zou moeten worden uitgevoerd, lijkt toegang tot niet-publieke bronnen derhalve noodzakelijk. Informatie van inlichtingendiensten en van financiële instellingen over giraal betalingsverkeer kunnen meer inzicht geven in internationale financiële stromen naar religieuze instellingen in Nederland. Dergelijke informatie is echter niet toegankelijk voor instanties zonder de bijzondere bevoegdheden van inlichtingendiensten. Zelfs voor deze diensten zal het praktisch en juridisch moeilijk zijn om deze vertrouwelijke gegevens op te vragen voor alle circa 450 moskeeën in Nederland, aangezien er voor het gros van deze instellingen geen reden lijkt om aan te nemen dat er onregelmatigheden plaatsvinden.

Mogelijke invloed van buitenlandse financiers op islamitische instellingen in Nederland

Buitenlandse financiering van instellingen in Nederland is niet noodzakelijk problematisch, laat staan illegaal. Niettemin bestaan er zorgen dat buitenlandse statelijke actoren deze financiering aan islamitische organisaties verlenen onder bepaalde voorwaarden, die mogelijk kunnen leiden tot activiteiten die in strijd zijn met de normen en waarden van de democratische rechtstaat. In deze studie waren we genoodzaakt ons te beperken tot indirecte indicatoren, zoals de aanwezigheid van buitenlandse bestuursleden, die mogelijk duiden op invloed van buitenlandse financiers. Deze bronnen en de informatie die ze verschaffen worden samengevat in de tabel hieronder.

Wat weten we over de mogelijke invloed van buitenlandse financiers op islamitische instellingen in Nederland?

Op basis van de voor ons beschikbare gegevens kunnen we geen algemene conclusies trekken over de eventuele voorwaarden waaronder financiering wordt verleend. Mogelijke invloedsuitoefening van buitenlandse financiers op het management van de betreffende instellingen bleek slechts aan te tonen met

behulp van een historisch overzicht van het bestuurslidmaatschap uit het Handelsregister van de Kamer van Koophandel. We noemen een bestuurslid 'buitenlands' als deze buiten Nederland geboren is en zijn/haar huidige adres ook buiten Nederland heeft. Van de totaal 1266 bestuursleden bij instellingen in de steekproef, zijn er 37 in buitenlands geweest over een periode van meer dan twintig jaar. Het gaat hierbij om 19 unieke individuen (men kan meerdere afgebroken bestuursperiodes hebben) verdeeld over 14 instellingen, waarvan er nu nog 16 zitting hebben in een bestuur. Momenteel is 17 procent van de bestuursleden in de 'doelgerichte' steekproef 'buitenlands', dit in vergelijking tot slechts 1.5 procent voor de random steekproef.

Tabel S.2: Overzicht van geraadpleegde informatiebronnen over mogelijke invloed van buitenlandse financiers

Informatiebron	Waaruit blijkt mogelijke invloed?	Geven de gegevens inzicht in invloed of voorwaarden van financiering?
Het Kadaster	Eigendom vastgoed en hypotheekgever	Nee
Handelsregister van de Kamer van Koophandel	Bestuursleden	Mogelijk, in enkele gevallen
Politiegegevens	(Vermeende) misdaden, overtredingen of onrechtmatige daden gerelateerd aan financiering	*Niet beschikbaar*
Dossiers van het Openbaar Ministerie	Vermeende) misdaden, overtredingen of onrechtmatige daden gerelateerd aan financiering	Nee, met enkele uitzonderingen

In enkele gevallen bleken berichten over buitenlandse financiering uit de media of AIVD-rapportage te corresponderen met de aanwezigheid van één of meerdere bestuursleden met dezelfde nationaliteit. Dit zou kunnen duiden op mogelijke invloed van de financier op het management en de dagelijkse praktijk van deze instellingen. Maar de bronnen geven geen informatie over de aard van deze invloed. Bovendien blijken er in de 'doelgerichte' steekproef veel meer niet-ingezetene bestuursleden voor te komen dan in de random steekproef, hetgeen suggereert dat de instellingen die regelmatig in het nieuws komen niet representatief zijn voor alle islamitische instellingen.

Overige informatiebronnen, zoals rechtszaken, bouwvergunningen, literatuur of online bronnen, gaven geen inzicht in mogelijke buitenlandse invloed buiten hetgeen reeds in de media werd bericht.

Wat zou de betrouwbaarheid zijn van inschattingen van voorwaarden die aan buitenlandse financiering worden gesteld?

Hoewel informatie van publieke instellingen betrouwbaar lijkt te zijn, stelt deze ons niet in staat om algemene conclusies te trekken over mogelijke voorwaarden die aan buitenlandse financiering aan moskeeën worden gesteld. Indien er al een indicatie van mogelijke onregelmatigheden bestaat, is het moeilijk aan te tonen dat deze daadwerkelijk verband houdt met financiering.

Het verbeteren van de kwaliteit van publieke data zal daarom waarschijnlijk niet leiden tot een verbeterd inzicht in de voorwaarden van buitenlandse financiering. Wij verwachten bovendien niet dat additionele publieke informatiebronnen wel een precieze en betrouwbare inventarisatie kunnen faciliteren. Wellicht dat dit kan leiden tot een accurater en completer overzicht van de buitenlandse bestuursleden, maar het geeft waarschijnlijk weinig inzicht in de aard van hun betrokkenheid bij de organisaties.

Informatie uit financierende landen

In zes potentiële financierende landen, te weten Marokko, Koeweit, Qatar, Saoedi-Arabië, Turkije en de Verenigde Arabische Emiraten (VAE), is online beschikbare informatie systematisch doorzocht naar mogelijke indicaties die duiden op financiering aan Nederlandse islamitische instellingen. Hoewel we niet op bewijs van dergelijke financiering uit andere dan deze zes landen zijn gestuit, valt het evenmin uit te sluiten dat ook vanuit andere landen financiering aan islamitische instellingen in Nederland voorkomt.

Welke informatie is beschikbaar in de geselecteerde financierende landen die inzicht kan geven over de omvang en aard van financiering aan islamitische instellingen in Nederland?

Over het algemeen is er weinig transparantie over de uitgaven van charitatieve instellingen in het Midden Oosten, Turkije en Marokko. Er blijkt weinig regelgeving te zijn die internationale donaties reguleert. In die landen (zoals bijvoorbeeld Saoedi-Arabië of de VAE) waar wel wetten bestaan die de oprichting en de organisatie van filantropische instellingen en stichtingen reguleren, blijft transparantie achter. De regelgeving zou de autoriteiten aldaar een duidelijk beeld moeten geven van de bronnen en bestemmingen van door de overheid erkende fondsen, maar wij hebben weinig kunnen traceren. Daarnaast blijkt uit de lokale media in financierende landen dat in enkele gevallen ambassadepersoneel officiële gelegenheden, zoals een ceremonie ter gelegenheid van de opening van nieuw moskeegebouw, heeft bijgewoond. Dat zou kunnen betekenen dat diplomatieke missies een completer beeld hebben van activiteiten en financiering door officieel erkende liefdadigheidsinstellingen dan dat duidelijk wordt na de analyse van het materiaal dat beschikbaar is in het publieke domein, zoals jaarverslagen.

Is het mogelijk om specifieke voorbeelden van buitenlandse financiering aan islamitische organisaties in Nederland te traceren in de financierende landen?

Voor het merendeel van de geselecteerde landen blijkt uit documentatie van verschillende overheidsinstellingen en fondsen dat er een actief beleid is van het financieren van religieuze activiteiten in het buitenland. Uit onze inventarisatie van liefdadigheidsinstellingen blijkt dat landen met een grote moslimbevolking de prioriteit krijgen. Het grootste deel van de financiering en de meerderheid van programma's zijn gericht op landen Afrika en Azië. Uit de beschikbare documentatie van de in aanmerking komende instanties uit de onderzochte financierende landen, konden we met uitzondering van enkele gevallen buitenlandse financiering aan Nederlandse instellingen niet bevestigen.

Het uitbreiden van de analyse met aanvullende gegevens

Op basis van de systematische analyse van beschikbare gegevens verwachten wij niet dat vervolgonderzoek aanvullende gegevens tot een betrouwbare en omvattende inschatting van de aard, omvang en invloed van buitenlandse financiering aan islamitische instellingen in Nederland zal leiden. Daarentegen achten we het wel mogelijk om de inkomsten en herkomst van donaties van individuele instellingen in gedetailleerd te

onderzoeken. Bijvoorbeeld van alle bestuursleden, beschikbaar in het Handelsregister, kunnen de antecedenten en huidige connecties met andere organisaties worden nagegaan. In individuele gevallen kan dit (vermeende) connecties met (internationale) organisaties en/of tussenpersonen aan het licht brengen die in verband worden gebracht met financiering van islamitische instellingen in West-Europa.

Andere typen gegevens, zoals informatie verstrekt door de instellingen zelf of politiegegevens kunnen helpen bij het inventariseren van mogelijke voorwaarden aan financiering. Het is mogelijk om alle circa 450 instellingen individueel te onderzoeken en zodoende het verband tussen financiële stromen, instellingen en hun acties in kaart te brengen, hetgeen eventueel bewijs vóór danwel tégen het uitoefenen van invloed kan opleveren. Dit is echter kostbaar en weinig efficiënt onderzoek, waarbij het moeilijk zal zijn deze links te verifiëren met enkel informatie in het publieke domein. Speciale opsporingsbevoegdheden lijken noodzakelijk om deze informatie boven tafel te krijgen.

In theorie kan een studie dus worden uitgebreid met informatie van inlichtingendiensten en financiële instellingen, maar wij bevelen niet aan een alomvattende inventarisatie te doen op basis van dergelijk informatie. Buitenlandse financiering en eventuele invloed op moskeeën en onderwijsinstellingen is niet *a priori* problematisch of onwenselijk, laat staan illegaal. De materiële en immateriële kosten van een dergelijke arbeidsintensieve en privacy-gevoelige exercitie zouden naar alle waarschijnlijkheid disproportioneel zijn aan de baten. Zelfs voor een dienst met de juiste bevoegdheden zal het praktisch en juridisch problematisch zijn een alomvattend onderzoek onder de islamitische instellingen in Nederland uit te voeren.

Aanbevelingen

Gezien de beperkte haalbaarheid van een alomvattende inventarisatie, sluiten we af met enkele aanbevelingen over wat mogelijk kan worden gedaan om een beter inzicht in buitenlandse financiering aan islamitische instellingen in Nederland te krijgen en om de financiële transparantie in deze sector te vergroten.

Bestudeer internationaal opererende organisaties die optreden als tussenpersoon

In deze haalbaarheidsstudie zijn een aantal internationaal opererende organisaties geïdentificeerd die mogelijk optreden als tussenpersoon of makelaar tussen financiers en instellingen in Nederland. Hoewel een systematische analyse van deze organisaties buiten de afbakening van dit onderzoek viel, zou nadere studie gerechtvaardigd zijn vanwege de belangrijke rol die ze lijken te spelen bij het koppelen van fondsen en moskeeën.

Stuur aan op een verbetering van de financiële transparantie in de sector

Islamitische instellingen en koepelorganisaties zijn weinig transparant over hun financiële huishouding. Onze aanbeveling zou zijn om islamitische instellingen te bewegen meer inzicht hierin te verschaffen teneinde de instellingen die niets te verbergen hebben niet nodeloos bloot te stellen aan nader onderzoek. Instellingen en koepelorganisaties kunnen hun financiële jaarverslagen publiceren of delen met de overheid en daarin informatie over donaties en financiering uit het buitenland opnemen. De overheid zou hierbij een rol kunnen spelen door zelf-regulering te stimuleren of co-regulering te faciliteren, eventueel in samenwerking met koepelorganisaties.

Een andere mogelijkheid is het uitbreiden van het toezicht op stichtingen en verenigingen in combinatie met de verplichting jaarlijks aangifte te doen van donaties uit het buitenland voor bedragen boven een bepaald minimum bedrag. Hierbij kunnen details over de financier door de toezichthouder eventueel op vertrouwelijke basis worden behandeld.

Hoewel het onwaarschijnlijk is dat alle instellingen zich zullen conformeren aan deze richtlijnen, zal het de financiële transparantie van het collectief vergroten, zodat de beschikbare middelen kunnen worden aangewend voor de instellingen die niet transparant zijn.

Summary

Funding of Islamic institutions and related activities by foreign government entities has received considerable attention in the Netherlands in recent years. Public debates appear to be fuelled by intelligence reports and media coverage of several cases of donations to mosques in the Netherlands from government-sponsored entities in several Middle Eastern countries. These have given rise to concerns that these donations may be granted on the basis of certain conditions, for example in return for influence on the institution's governance, daily management or religious practising. Ultimately, there is a risk that such influence leads to behaviour or activities that are in conflict with democratic values.

Research scope and objectives

The size and nature of foreign funding of religious institutions is subject to speculation. Foreign funding is not registered centrally, nor is there an obligation to report such donation. Hence, little is known about the origins of funding to mosques in the Netherlands, which is why it is difficult to draw any firm conclusions as to whether these concerns are justified. As specified in the so-called *Motie Segers*, the Dutch Parliament (*Tweede Kamer*) indicated that there is a need to provide an overview of the size and scope of foreign financial support provided to Islamic institutions in the Netherlands. The Research and Documentation Centre (*Wetenschappelijk Onderzoek- en Documentatiecentrum*, WODC) has tackled this through a staged approach. The first phase was commissioned in June 2014 and comprises an assessment of the feasibility of conducting a full analysis of the size and scope of foreign funding of Islamic institutions in the Netherlands and the possible conditions under which foreign funding might be provided. This document reports on the results of that feasibility study.

The terms of reference requested that the study should focus on mosques or mosque-related organisations (e.g. *moskeeverenigingen*) and two higher education institutes (HEIs). Moreover, the present feasibility study focuses on potential funding provided by foreign state(-related) entities. Whilst the study is not limited to data only available in the public domain, such public sector data will provide a first and the main step in determining the feasibility of a more comprehensive assessment. Where possible, we identified and requested access to classified sources to complement the analysis.

The context of foreign funding of religious institutions

Background literature suggests that for historical reasons, mosques in the Netherlands have typically taken the form of associations (*verenigingen*) and foundations (*stichtingen*). Besides the flexibility offered through their legal structure, the ease of setting up such legal entities seems another appealing feature. As such there is limited external oversight of foundations and associations. Additionally, Islamic organisations in

the Netherlands and elsewhere have been under increased scrutiny since the events of 9/11. These factors seem to have limited the financial transparency of Islamic institutions. External financing of associations and foundations – whether religious or not – is common in the Netherlands and elsewhere. And despite the tradition of community-based donations, the costs of large projects, such as (re-)construction of mosques, are unlikely to be raised within the local community. As public sector funding to religious institutions does not exist in the Netherlands, large external donations are practically inevitable. Hence, there is little doubt that such funding by foreign actors, including governments and related central funds, to Islamic institutions in the Netherlands exists.

Islam is not the only religion with strong philanthropic traditions. Faith-based philanthropy (*Zakat* for Muslims) plays an important role in other religions such as Hinduism (*Daan* or *Seva*) and Christianity (giving of *alms*). However, Western countries have historically been a source, rather than a recipient, of faith-based foreign donations. Funding to religious (non-Muslim) Diasporas in Western countries does not appear to occur regularly. We have identified little evidence of funding from state actors abroad to other religious communities in Western countries. Moreover, we did not identify any indications of an institution-funding mechanism as opposed to individuals or groups. These findings seem to suggest that funding from foreign state actors to religious institutions in the West may be more common for Islam than for other religions.

Approach

In addition to a review of the literature and documentation available on the topic of this study and a set of scoping interviews with key informants, we have taken a quasi-experimental approach to testing the availability and relevance of information. This approach consisted of two main components:

1. A systematic and comprehensive appraisal of data available in the Netherlands on Islamic institutions offering insight into the size and scope of foreign funding and its potential influence. This information has been derived from public sector sources, such as the trade register at the chamber of commerce, the land registry, municipal archives, customs, court cases, and online sources, as well as from some confidential sources made available to us.
2. A systematic and comprehensive appraisal of publicly available data in six potential source countries on funding of Islamic institutions in the Netherlands.

With these sources we assessed the feasibility of conducting a full assessment for two samples of institutions out of a long-list of 355 Islamic institutions in the Netherlands. One sample (n = 19) consisted of mosques and HEIs selected from a pool of institutions that had featured in the media for various reasons. This sample included institutions that, on the basis of these reports, have received special attention in the context of the subject of this study. The other sample (n = 20) comprised a control group of randomly selected institutions. The information collected for both samples was then triangulated across the different sources.

Despite having offered anonymity to key informants and assurance that data would be treated confidentially, several organisations and individuals appeared hesitant to contribute to this feasibility study. The limited data availability has complicated this assessment. Notwithstanding these

complications, we summarise the key findings and conclusions below in relation to each of the research questions formulated for this study.

Size and scope of funding

We have assessed the type of information and evidence on foreign financing that can be derived from public sources and assessed the likelihood that a full-study, with additional resources, would be able to generate answers to all the research questions.

What information is available in the Netherlands about the nature and size of funding of Islamic institutions by foreign state actors and types of funders?

From the available documentation it is known that official links exist between mosques in the Netherlands and foreign governments (e.g. Diyanet) or international organisations (e.g. Milli Görüş). However, the documentation reviewed does not provide any indication of the possible size of such funding from Turkey to Dutch institutions. The links to foreign funding of Islamic institutions in the Netherlands that have been identified in the literature and online material could in several cases be confirmed by data from public institutions and from confidential sources (see Table S.3Table).

Table S.3: Overview of data from public authorities and online material

Data source	Data available?	With regards to religious institutions, does it provide…	
		Indications of foreign funding?	Figures of foreign funding?
Land Registry (*Kadaster*)	Yes	Yes: through mortgages	No
Annual reports	Yes, but only for a few institutions	No	No
Customs: cash transfer	Yes	No	No
Permits from municipalities	Yes	Yes	Yes, in one instance
Police records	Not made available within the study's timescale	*Not available*	*Not available*
Prosecutor files	*Not analysed*		
Court cases – (Rechtspraak.nl)	Yes	Yes	No
General web searches	Yes	Yes	No
Diplomatic sources	No, but we were made aware of correspondence between Ministry of Foreign Affairs and one source country embassy	Yes	No, only in one specific case an amount was mentioned
Intelligence reports	Yes, one FIU report was reviewed after signing an NDA	Yes	Yes, in some cases

Access to police records was not offered within the timescale of the study. As a consequence, we were unable to analyse these data and follow-up subsequent links to prosecutor files. With more time and resources available in a full study however, these data would likely be available.

Based on the available information, is it possible to approximate the size and scope of the identified foreign funding by foreign state actors?

The collected data provided verification of individual cases reported in the literature or the media of funding to specific Islamic institutions in the sample. However, they do not allow for a general estimate of the size of foreign funding. Literature suggests that informal and cash payments play an important role in financial transactions between Islamic organisations and communities. Moreover, a crucial type of information –that of transactions between bank accounts – is not publicly available. While some individual cases of foreign donations could be verified with, for example, the use of data from the Land Registry, they are unlikely to offer an effective approach to identifying or scoping the broader funding environment.

Moreover, caution is required when trying to extrapolate the findings beyond the two samples. The differences in the findings between the random sample and the purposive sample suggest that those institutions that, for instance, regularly feature in the news are not representative of the entire population of Islamic institutions in the Netherlands. For instance, the purposive sample contains several institutions with recent construction projects or plans, requiring considerable amounts of funding. Compared to institutions that are more in the limelight, the random sample barely contained any indications of foreign funding.

What would be the reliability of estimates of the nature and size of foreign funding of Islamic institutions in the Netherlands?

One of the reasons for the difficulty of deriving solid conclusions from the available evidence is the rather diverse data quality. Whilst information in the public records tends to be reliable, data for sample institutions are not always complete. Moreover, there is little transparency of the financial status, income or expenditure of Islamic institutions. For instance, of the 39 institutions in the two samples, we only identified one annual report, which did not provide information about donations.

However, in case of a comprehensive assessment, it seems necessary to access additional data which is not publicly available rather than just improving the quality of the current public data. Intelligence information as well as data from banks on international account transactions would potentially provide more insight into the financial flows to religious institutions in the Netherlands. Such intelligence information, however, is not available to (research) institutions without a special investigation mandate. Moreover, even for intelligence agencies it would likely be difficult to obtain account transaction data for a large sample of institutions without a collective suspicion of illegal or harmful activities.

Influence of funding on Islamic institutions

Whilst foreign funding can be expected and is not *a priori* problematic, there are concerns that foreign state actors might provide funding to Islamic institutions in the Netherlands under certain conditions, potentially giving rise to behaviour or activities that are in conflict with democratic values. In this study we have relied primarily on indirect proxies to providing potential indications of conditions to foreign funding. The outcomes or manifestations we have examined were based on data sources listed in Table S.4.

Table S.4: Overview of data from public authorities on influence

Data source	How would influence be identified?	Do the data provide insights into influence or conditional funding?
Land Registry (*Kadaster*)	Ownership and mortgage arrangements	No
Chamber of Commerce	Board membership	Possibly, in some cases
Police and prosecutor records (*not available*)	(suspected) crimes, offences or wrongful acts attributed to funding	*Not available*
Court cases	(suspected) crimes, offences or wrongful acts attributed to funding	No, with some exceptions

What do we know about the nature of the identified foreign financing and, if applicable, under which conditions the funding is provided?

On the basis of the sources reviewed it is not possible to derive any generalizable conclusion about possible conditions under which funding is provided. It seemed that it is only possible to verify potential influence on the institutions' governance through a review of board membership over time from Chamber of Commerce records. We use the term 'foreign' board members for those board members who were born outside the Netherlands and whose current address is also abroad. Out of the total number of 1266 board members that the 39 sample institutions have had over more than the past two decades, 37 have been based abroad. They refer to 19 unique individuals (one may have multiple separate board tenures) distributed across 14 institutions, 16 of whom are still active. At the moment, 17 per cent of board members in the purposive sample are 'foreign', compared to only 1.5 per cent in the random sample.

In some cases, links to foreign funders and international intermediaries for specific institutions reported in the literature, media and by intelligence agencies appeared to correspond to board memberships from the same countries. This could be taken as an indication that the funder may have some influence on the management of or practices at these institutions. Yet caution is required, as nothing is known about the nature of these arrangements. Moreover, the frequency of foreign board membership in the purposive sample appears to be much higher than in the random sample, suggesting that institutions featured in the media are not necessarily representative of the entire population of mosques.

Other data sources, such as court cases, construction permits, literature or online sources verified several cases that were reported in the media, but provided no additional insights into funding conditions or influence.

What is the quality of the assessment of conditions under which the funding is provided?

While information received from the public authorities tends to be reliable, it does not allow us to draw any substantial conclusion on possible conditions that might be attached to the foreign funding of mosques in the Netherlands. Even if there are indications of potential irregularities, it is practically impossible to establish a causal relation with the role of foreign funding.

Attempts to further improve the quality of the current data are therefore unlikely to increase the possibility to generate insights into any conditions attached to funding. It is also unlikely that with

additional public sources, such as police records, a more precise and reliable examination could be made. While it would increase the accuracy of the assessment of, for example foreign board members, this is unlikely to yield any additional insights into the nature of these arrangements.

Information from retrieved source countries

We have systematically reviewed the information available from public sources in six potential funding countries: Morocco, Kuwait, Qatar, Saudi Arabia, Turkey, and the United Arab Emirates. Whilst we have not identified evidence of funding to Islamic institutions in the Netherlands from other countries, it cannot be ruled out either.

What information is available in the selected source countries about the size and scope of the funding to Islamic institutions in the Netherlands?

In general, there is very little transparency of the expenditure of donor or funding agencies in the Middle East, Turkey, and Morocco. Few regulations or laws appear to govern donations to other countries. Even in countries where laws and regulations governing the establishment and management of charities and foundations exist (e.g. Saudi Arabia or UAE), there is little transparency. Such existing regulation should allow local state institutions to have a clear picture of sources of funding and recipients of programmes of state-licensed charities, foundations and organisations, but we have traced little information. Also, media in source countries have reported on the attendance of embassy or consulate representatives at some launch events and inaugurations. This seems to suggest that some source countries' diplomatic missions might have a more comprehensive picture of activities and funding emanating from state-registered charities than immediately available through publicly available (annual) reports.

Is it possible to trace specific examples of foreign funding of Dutch Islamic institutions in both the source country and in the Netherlands, and thus, to what extent are these sources mutually supportive?

Documentation from government institutions and donor agencies in source countries selected for this study suggests that there is an active policy of funding religious activities abroad in the majority of source countries. Our review of source countries' charities and foundations seems to indicate that countries with a significant Muslim population in Asia and Africa are prioritised both in terms of volume of funds disbursed and number of programmes run. With only a few exceptions, funding to Islamic institutions based in the Netherlands could not be cross-verified with publicly available information in source countries.

Extending the analysis or adding information sources

Based on our analysis, we do not expect that expanding the study by adding data sources or extending the analysis would provide evidence upon which a reliable and comprehensive estimate of the scope, size, and influence of foreign funding of Islamic organisations in the Netherlands can be made. However, it would be possible to investigate the financial accounts and funders of each individual institution in more detail. For instance, current and historical affiliations of all board members, available from the Chamber of Commerce records, might in individual cases reveal information about (alleged) links to (international or intermediary) organisations that are thought to be involved in funding Islamic institutions in Western Europe.

Other sources of data, such as self-reported data, police records or prosecutor data, might help to gain insight into the conditions of funding. It might be possible to investigate each individual institution in more detail to map the links between financial flows, institutions, individuals and their actions, which may or may not reveal evidence of influence. However, aside from the resource-intensiveness of such an exercise, it tends to be difficult to verify these links when relying on information available in the public domain. Hence, it would require the capabilities and a mandate of special investigative (intelligence) agencies.

While a study could theoretically be expanded with intelligence and bank transfer data, we do not recommend embarking on a comprehensive analysis of all Islamic institutions based on such data. Foreign funding and even influence on Islamic institutions in the Netherlands is not *a priori* problematic, undesirable, or illegal. The material and immaterial costs of such an invasive and resource-intensive approach should not be disproportionate to its potential benefits. Even for an institution with a special investigative mandate, such as an intelligence agency, it will be practically and legally problematic to conduct such a comprehensive assessment of Islamic institutions.

Recommendations

Given the limited feasibility of a comprehensive assessment, we end this study with some general recommendations on how to improve understanding of the international landscape for funding of Islamic institutions and to increase financial transparency of Islamic institutions in the Netherlands.

Focus on internationally operating intermediaries

Through the analysis of publicly available and confidential information and through the interviews we identified a number of internationally operating intermediary organisations which seem to be involved financing Islamic institutions in the Netherlands. While a systematic analysis of these intermediary organisations was outside the scope of this study, they do appear as organisations that would be of interest in a further study as they could potentially play a role in the foreign financing of Islamic institutions in the Netherlands. A more thorough study of these organisations would therefore increase the understanding of the international landscape for funding of Islamic institutions, in terms of their aims, activities and financial flows.

Facilitate improving financial transparency among Islamic institutions

There is little financial transparency among Islamic institutions and umbrella organisations in the Netherlands. Our recommendation would be to encourage these organisations to improve this transparency, avoiding any unnecessary invasive investigation of those institutions that have nothing to hide. Institutions and umbrella organisations should be encouraged to publish their annual report or share it with the government, presenting information about donations and other funding from abroad. The Dutch government could play a role in this process by facilitating co-regulation or stimulating self-regulation, possibly in collaborating with umbrella organisations.

Alternatively, regulation and monitoring of the charitable sector may be widened in combination with the obligation to report donation of amounts above a certain threshold from funders residing abroad. Details

of the name of the organisation, institution type, the value of the donation, and its purpose may be captured and kept confidential to the monitoring agency.

Whilst it is unlikely that all institutions will comply with these approaches, it will help focus the efforts and resources on a small sample of non-transparent institutions and hence increase trust and transparency within the community of Islamic institutions as a whole.

Acknowledgements

The authors are grateful to a large number of individuals and organisations who contributed to this study by providing information, donated their time to be interviewed, provided steer or advice and/or commented on draft versions of this report. We would like to acknowledge some of them in no particular order.

We are thankful to the members of the scientific steering committee assembled by the WODC, who offered their expertise, provided feedback on the methodology and research design and commented on the drafts. The steering committee consisted of: prof. dr. Jan Rath (chair, University of Amsterdam), drs. Joris Rijbroek (Ministry of Social Affairs), dr. Henk van der Veen (WODC), prof. dr. René Bekkers (VU University Amsterdam), prof. dr. Hans Visser (VU University Amsterdam), dr. Hans van Miert, and drs. Lisanne Vleugels (Ministry of Security and Justice, NCTV).

A large number of individuals contributed to the study by participating in key informant interviews, interviews with representatives of public sector institutions or by providing written input by means of email correspondence. Those individuals who consented to being acknowledged are listed in Appendix C. Some preferred to be listed anonymously. We are also grateful to the staff members of the Kamer van Koophandel, Kadaster, and local municipality of two cities in the Netherlands, who assisted in the data collection.

We thank our peer reviewers as part of RAND's quality assurance process, Ines von Behr and Alexandra Pollitt for their helpful comments on draft versions of this report. We are also grateful to our RAND colleagues Bill Young, Howard Schatz, Patrick Johnston, and Dalia Dassa Kaye for their helpful advice and suggestions. Over the course of the study, the research team has also benefited from the excellent research assistance of Minke van der Sar, Alex Hull, and Maurice Fermont.

1. Introduction

The principles of keeping religion at "arm's length" of the public domain still underpin the foundation of the Dutch democratic state (De Hart, 2014). This means that the public sector in the Netherlands cannot allocate financial resources to support groups in activities that are explicitly religious (Overdijk-Francis et al. 2009). Although this does not exclude providing subsidies to religious groups, for example serving the wider public interest of reducing social exclusion, it does imply that activities of worship or evangelisation are not eligible for public funding. Construction or maintenance of places of worship (churches, temples, mosques, etc.), for instance, is typically not financially supported through public resources. In absence of public sector funding, religious institutions will need to allocate their funding through donations from individuals within the community, from the third sector, that is private sector institutions, or from individual financiers within the Netherlands or abroad.

Foreign funding of religious institutions in the Netherlands is not by necessity problematic or illegal as outlined in a recently published advice to the government by the Dutch Social Development Council (Raad voor Maatschappelijke Ontwikkeling, RMO). The advice observed that in the same way the Dutch government might provide funding for human rights organisations in third countries, other state actors might provide funding for (religious) institutions in the Netherlands. Foreign finance and even influence need thereby not be problematic or illegal as long as the outcome is not illegal (RMO 2014). This principle of reciprocity therefore provides an important background to this study.

1.1. The political context of this study

Funding of religious institutions and activities from foreign entities has received considerable attention in recent years. Parliamentary debates (Tweede Kamer 2008), intelligence agency reports (AIVD 2004), and letters from Ministers of Interior Affairs (Ter Horst 2009) and of Security and Justice (Opstelten 2013) suggest there is increasing concern about the nature of these financial constructions. The attention of this debate focuses on foreign funding of Islamic institutions in the Netherlands. This concern appears to be fuelled by intelligence reports (e.g. AIVD 2004) and media coverage of foreign donations to mosques that may be granted on the basis of certain conditions, for example in return for influence on the institution's governance, daily management or religious practicing.

As the size and nature of foreign funding of religious institutions is subject to speculation, it is difficult to draw any firm conclusions about whether these concerns are justified. As specified in the so-called *Motie Segers* (Tweede Kamer 2012), the Parliament indicated there is a need to provide an overview of the size and scope of foreign financial support to Islamic institutions in the Netherlands. A subsequent motion

filed by Yűcel, Azmani and Heerma requested to include two Islamic higher education institutes based in the Netherlands in this overview (Tweede Kamer 2013). The Minister for Security and Justice, Mr Ivo Opstelten, responded that he had requested the Research and Documentation Centre (*Wetenschappelijk Onderzoek- en Documentatiecentrum*, WODC) to commission such a study assessing the size and scope of funding from foreign state actors to mosques in the Netherland, as well as the potential influence that such actors may exert (partly) as a consequence of this funding.

Before embarking on such a complex and delicate undertaking, the WODC decided that this will be tackled through a staged approach, commencing in Phase 1 with preliminary estimate and assessment of the feasibility for a comprehensive estimate. Pending the outcome of Phase 1, a detailed and comprehensive estimate in Phase 2 and an assessment of influence in Phase 3 will follow.

On 1 June 2014 RAND Europe was commissioned to undertake Phase 1 of this staged approach. In this document, we report on the methodology, research activities and findings under Phase 1.

1.2. Aim and scope of the study

The aim of the study is to examine the feasibility of conducting a full analysis of the size and scope of foreign funding of Islamic institutions in the Netherlands and the possible conditions under which foreign funding might be provided.

This objective is based on a number of starting assumptions about the scope of the study:

- The Islamic institutions considered in this study include mosques or mosque-related organisations (e.g. moskeeverenigingen) or higher education institutes.[1]
- We understand the size of foreign funding refers to: 1) the share or the number of Islamic institutions in the Netherlands to receive any funding from foreign state actors; and 2) the cumulative amount of foreign funding from foreign state actors to Islamic institutions in the Netherlands.
- As set out in the terms of reference (*startnotitie*), this feasibility study focuses exclusively on foreign funding by state entities (including 'Zakat funds') provided to Islamic institutions. This implies that the assessment does not specifically consider funding or donations from non-state, including private, actors. However, if important non-state funders are identified in the analysis, we do report on them.
- The analysis of the "conditions under which the funding is provided" stems from a concern about potential influence by foreign state actors on religious institutions and their communities in the Netherlands. As indicated above, such influence need not be problematic. However, the concern appears to focus on potential 'undesirable influence' by foreign funders. Without providing a strict definition, we consider such undesirable influence to refer to the spreading of ideas and encouraging actions that may be in conflict with the law, with democratic values or with social norms in the Netherlands.

---

[1] As requested in the Motion Yűcel, Azmani, and Heerma (Tweede Kamer 2013).

- Whilst the study is not limited to data available in the public domain, this data will provide a first and the main step assessing the feasibility of a more comprehensive assessment. Where possible, we identified and requested access to classified sources to complement the analysis.

1.3. Research Questions

The research team focused its work on answering the following research questions. These questions were identified by the WODC in the terms of reference, and the research team proposed to complement and augment these questions on the basis of its experience and knowledge of the field:

1) Which five countries can reasonably be expected to be the major financiers of Islamic institutions in the Netherlands?[2]
2) What information is available in the Netherlands about the nature and size of funding of Islamic institutions by foreign state actors and types of funders?
3) What information is available in the five selected source countries about the size and scope of the funding to Islamic institutions in the Netherlands
4) Is it possible to trace specific examples of foreign funding to Islamic institutions in the Netherlands with information from both the source country and the Netherlands, and thus, to what extent are these sources mutually supportive?
5) Based on the available information, is it possible to approximate the size and scope of the identified foreign funding by foreign state actors and (Zakat) funds? If so, what would be a preliminary estimate?
6) What do we know about the nature of the identified foreign financing and, if applicable, under which conditions the funding is provided?
7) How does the funding landscape of Islamic institutions in the Netherlands compare with that of comparable institutions in other religions?
8) What is the quality of the estimates of the nature and size of foreign funding of Islamic institutions in the Netherlands and the conditions under which the funding is provided?
    a) To what extent is the collected information exhaustive?
    b) Is there any reason to think it may create a biased picture of the situation?
    c) How reliable and how valid is the available data? Would it be possible to confirm the accuracy of the data, for example through triangulation of the identified sources in the Netherlands and those in the financing states?
9) To what extent do the results of the feasibility study offer the prospect of a more precise and reliable examination of the size and nature, if additional sources were to be used?
10) What would need to be done to gain a (more) complete and accurate overview of foreign funding to Islamic institutions in the Netherlands?

[2] The *Startnotitie* mentions that the selection should be based on the size of funding, but also the number of institutions financed and the extent of transparency.

1.4. Structure of this document

The document starts with two introductory chapters that set the context for the study. We provide a background of Islam, Muslims and Islamic organisations and institutions in the Netherlands in Chapter 2. It concludes with an explanation of the legal entities formed by Islamic institutions and their mosques, the regulatory challenges related to this and how this is managed in some other countries. Chapter 3 explains the traditions and specificities of funding and finance in Islam and the following consequences for funding of Islamic institutions in the Netherlands.

In Chapter 4 we provide a detailed and elaborate explanation of the methodology used for this study. We identify 355 mosques and two higher education institutes as the main subjects for the assessment, select a sample of them and for each potential data source we explain our approach, even if these data sources could not be accessed. We also select six (potential) source countries to triangulate the findings.

In the Chapters 5, 6 and 7 we apply this approach to the sample of institutions and to six (potential) source countries. Firstly, in Chapter 5 we report on the data collected about the size and scope of foreign funding to the sample of Islamic institutions in the Netherlands and we assess of the feasibility of conducting a comprehensive assessment. Secondly, in Chapter 6 we report on the data collected about the potential conditions of foreign funding to the sample of Islamic institutions in the Netherlands and we assess the feasibility of conducting a comprehensive assessment. Thirdly, Chapter 7 provides a detailed account of publicly available information about funding to Islamic institutions in the Netherlands in six potential source countries and we triangulate these findings with those identified for the sample institutions in the Netherlands.

Finally, we synthesise the findings from these systematic data collection efforts and aim to answer each of the research questions formulated in Section 1.3. We draw conclusions about the feasibility of a comprehensive assessment of the size, scope and conditions of foreign financing to Islamic institutions in the Netherlands and make some final recommendations.

2. Islam in the Netherlands

This chapter will provide a basic context to Islam in the Netherlands, in particular, what groups the community consists of (2.1 and 2.2) and how Islamic institutions have been legally organised (2.3). Furthermore, as the potential recipient of foreign funding we need to understand what is already known about the foreign funding of institutions in the Netherlands (2.4).

2.1. Muslims and mosques in the Netherlands

For the vast majority, Muslims in the Netherlands have a migrant background. Islam therefore became the second religion in the Netherlands in the later 1960s, 1970s and 1980s with the arrival of Turkish and Moroccan migrants. A majority of the estimated 825,000 Muslims in the Netherlands is therefore of Turkish or Moroccan descent, yet smaller groups from Afghanistan, Iraq, Iran and Somalia (Central Bureau voor de Statistiek, CBS 2009) are also present.

Table 2.1: Country of origin of Muslims in the Netherlands

Country of origin	Estimate	Share
Turkey	329000	38%
Morocco	314000	37%
Surinam	34000	4%
Afghanistan	32000	4%
Iraq	31000	4%
Somalia	21000	2%
Pakistan	19000	2%
Iran	13000	2%
Other	62000	7%
Total	855000	100%

Source: FORUM (2010) estimate based on CBS Statline

The exact number of mosques maintained by the entire Muslim community is not known but estimates suggest around 450 mosques in 2003 (Maliepaard & Gijsberts 2012). Recent publications note that there are 242 Turkish and 179 Moroccan mosques in the Netherlands (De Hart 2014). The first mosques and mosque-organisations, established in the 1970s and 1980s, were primarily housed in existing buildings; construction of new mosques is a relatively new phenomenon (Bal 2014). Today, the majority of mosques

are still housed in premises that were built for other designations, such as old schools, while around 150 have been newly built (Van Drimmelen et al. 2014).

While most Muslims in the Netherlands are Sunni, there are substantial differences between the Turkish and Moroccan Muslim communities in the Netherlands. Survey research (Maliepaard & Gijsberts 2012) has found that of the major migrant communities in the Netherlands, the Turkish community tends to be more inwardly focused and maintains the strongest orientation towards the country of origin. By contrast, Moroccan Muslims have been found to be more conservative in matters of religion and tend to be more active in their faith (Table 2.2). A person is defined as Moroccan or Turkish if they themselves or at least one of their parents have been born in Morocco or Turkey.

Table 2.2: Religious activities of Turkish and Moroccan communities (2011)

Percentage of respondents answering "Yes"	Turkish respondents	Moroccan respondents
Viewing themselves as Muslim	94%	97%
Visiting a mosque at least once a week	42%	44%
Praying five times every day	27%	76%
Fasting for all days of the Ramadan	66%	93%
Eating halal every day	80%	94%
Wearing a headscarf (women)	48%	64%

Source: Maliepaard M., Gijberts M. (2012) Moslim in Nederland 2012. Den Haag: SCP

Most mosques in the Netherlands are associated with one or more umbrella organisations and mosques are, at least partly, governed by these organisations (Bal 2014). This is particularly the case for the Turkish mosques (Landman 2014). In order to further understand the landscape of Islamic institutions in the Netherlands, it is therefore necessary to outline some of the major umbrella organisations in detail, not least because this will provide a first insight into existing and potential funding and governance arrangements with other countries.

2.2. Different Muslim communities in the Netherlands

While Ottoman traders had started settling in the Dutch port cities since the 16th century, it was the attraction of migrant workers from primarily Turkey and Morocco that made Islam the country's second religion. In this section, we discuss four Islamic communities in the Netherlands identified in the literature, consisting of Turkish Muslims, Moroccan Muslims, Salafi networks and Muslims linked to the World Islamic Mission.

2.2.1. Turkish Community

The Islamic-Turkish community in the Netherlands today is marked in large part by four 'streams' which, apart from one (Gulen-Movement), are relatively well organised and represented through umbrella organisations (Diyanet, Milli Görüş, and Suleymanli) (Sunier & Landman 2014). These three umbrella

organisations were formed in the 1980s and 1990s, when competition between the streams tended to arise for members in the Netherlands. This was partly spurred by political developments in Turkey. Thus, rather than representing varying streams of Islam, differences between mosques and their umbrella organisations stem from national-legal matters related to Turkey. As the three umbrella organisations account for the majority of Turkish mosques in the Netherlands, we will briefly describe their main characteristics.

Diyanet: Islamitische Stichting Nederland (ISN)/Turks-Islamitische Federatie (TICF)

The Turkish government has a Presidency of Religious Affairs (Diyanet İşleri Başkanlığı) which is often referred to as Diyanet. The Islamitische Stichting Nederland (ISN) together with the Turks-Islamitische Federatie (TICF) forms the Dutch branch of Diyanet and is thereby directly related to the Turkish government. While the mosques falling under both organisations are the same, apart from one, ISN is more directly involved with the management of mosques and has in recent years been more visible, and is therefore of greater interest for this study.

ISN was formed in 1982 as an umbrella organisation which currently comprises 143 mosques (Sunier & Landman 2014, 64). The organisation is based on a strong top down structure whereby the positions of the highest governance bodies are filled by Diyanet civil servants from Turkey. Through this direct link, Diyanet has influence over the governance of the ISN mosques in the Netherlands. In addition, Diyanet decides on and pays the imams that serve the mosques (Sunier & Landman 2014). Most imams in Diyanet mosques in the Netherlands have been educated in Turkey and typically serve for four to five year periods in the Netherlands. Thus, of all the Turkish Islamic organisations in the Netherlands, ISN has the most visible and formal links with the Turkish Government

Milli Görüs

In Europe Milli Görüş has its strongest presence in Germany, where it has its headquarters. Originally a political movement, Milli Görüş aimed at a re-Islamisation of Turkish society in the second half of the 20th century. Given these roots, Milli Görüş is generally seen as one of the more conservative Islamic organisations, also in the Netherlands. In 1981, Milli Görüş sympathisers in the Netherlands founded the organisations that today is known as Milli Görüş, and which is split into two sub organisations according to its geographical location: North-Netherlands and South-Netherlands. The North section is considered to be more liberal by external commentators (Sunier & Landman 2014, 72), yet Milli Görüş themselves note the division is simply based on organisational grounds. Numerically smaller than the ISN, Milli Görüş North comprises 22 mosques and Milli Görüş South 19 organisations of which 17 are mosques.

Commentators note that the Dutch branches of Milli Görüş are well embedded into the wider European structures of Milli Görüş (Sunier & Landman 2014, 72). In terms of governance this means that the mosques are quite strictly regulated by the Dutch umbrella organisation of Milli Görüş, which in turn is influenced by the headquarters in Cologne in Germany. In terms of the relationship with the Turkish government, it is observed by commentators that while the tensions between Milli Görüş and the Turkish state have decreased in recent years, Milli Görüş continues to assert its independence from the Turkish government (Sunier & Landman 2014, 73).

Süleymanlı: Stichting Islamitisch Centrum Nederland

The third well-organised network of Turkish Muslims in the Netherlands is the Dutch branch of the Süleymanlı movement. The movement rose in Turkey in the middle of the twentieth century and is generally seen as a 'mystical' branch of Islam (Sunier & Landman 2014, 52). Compared to the other streams it has received less attention, yet is consists of 48 organisations in the Netherlands. The Süleymanlı movement is represented in the Netherlands by the umbrella organisation Stichting Islamitisch Centrum Nederland (SICN) which was founded in 1978. The member institutions refer to themselves explicitly as centres rather than mosques as they engage in activities that are broader than religious services such as extensive religious education (Sunier & Landman 2014, 57). Governance is not as strict and formal as among Diyanet and Milli Görüş, yet Sunier and Landman (2014) have noted that strong informal links exist between SICN and the international federation of the Süleymanlı movement, which in the end is governed from Istanbul (Sunier & Landman 2014, 56).

2.2.2. Moroccan Community

The Moroccan community in the Netherlands in comparison to the Turkish community is much less characterised by hierarchical umbrella organisations and is based much more on individual and autonomous mosques (Landman 2014). In turn, the role that the Moroccan government plays in the mosques of the Moroccan community is much more modest than the explicit role taken up by the Turkish government through Diyanet. Today therefore, the Moroccan community in the Netherlands does not have strong umbrella organisations, and the only real existing umbrella organisation, the *Unie van Marokkaanse Moskeeën* in Nederland (UMMON), is less directly involved in the running and governance of mosques than its Turkish counterparts (Landman 2014).

The UMMON was established in 1977 and in the 1980s covered around 80per cent of Moroccan mosques in the Netherlands. Currently, UMMON represents about 90 Moroccan mosques, which corresponds to just 62per cent of the estimated 145 Moroccan mosques in the Netherlands. In the past, UMMON has been associated with Moroccan government through an explicit loyalty to the Moroccan monarchy. Still, both the links between Moroccan government and UMMON, as well as between UMMON and individual mosques are largely informal and do not exhibit the institutionalised nature of either Diyanet or Milli Görüş (Landman 2014).

2.2.3. Salafi networks

Considerable attention in recent years has been paid to Salafi networks and groups in the Netherlands and to the mosques associated with them. Members associated with Salafi groups tend to be more conservative, striving for a 'pure' interpretation and implementation of the Quran and Sunnah as in the times of the Prophet Mohammad and of the 'Rightly Guided Caliphs'. In Saudi-Arabia, Salafism was developed through the official Wahhabi stream of Islam. Since the 1970s Saudi-Arabia has actively sought to promote Wahhabism, and by extension Salafism worldwide (Roex 2013). Nonetheless, it should be kept in mind that the term 'Salafi' is now employed in reference to a vast variety of groups as well as ideological and religious positions. The heterogeneity of the broad Salafi movement is seen to be stemming from the inherently subjective nature underlying the interpretation and adaptation of

immutable religious principles to contemporary problems and contexts, as done by Salafi scholars (Wiktorowicz 2006). Little is known however, about the internal organisation of Salafi networks and groups in the Netherlands, and they are not linked by a particular umbrella organisation (Landman 2014).

In the Netherlands, a number of mosques have nevertheless been associated with Salafi networks (AIVD 2004, Roex 2013). In turn, these mosques either have formal, institutional links to international organisations, or are known or thought to have informal links. Organisations from Saudi Arabia in particular, such as the Al-Waqf Al-Islami, are formally linked to, and have invested in, mosques in the Netherlands, such as the El-Fourkaan mosque in Eindhoven (Roex 2013). Finally it has been noted that in recent years new Salafi networks are formed from within the Netherlands itself, which link up, usually online, to wider international Salafi networks (AIVD 2007, Roex 2013).

2.2.4. World Islamic Mission

Apart from the groups discussed in this chapter, there are other smaller groups of Muslims in the Netherlands. A final Islamic group that can be mentioned is the World Islamic Mission (WIM) which is represented through several mosques in the Netherlands, among which is the Taibah mosque in Amsterdam. The WIM developed out of the Barelvi-movement, which forms a stream of Sunni Islam with a substantial following (over 200 million) in South Asia. It was established in the 1970s by the Pakistani thinker Shah Ahmad Noorani Siddiqui, and today most of the members of the WIM in the Netherlands are also largely of Indian, Pakistani and Suriname decent (Landman, 2014).

2.3. Legal and organisational context of Islamic institutions in the Netherlands

The Islamic communities in the Netherlands have typically used a specific set of legal and organisational entities to govern their institutions. The reasons for this can be traced back to the historical political and legal context in the Netherlands when most Islamic institutions were settled. This section elaborates on this context and explains its importance for this study.

2.3.1. The role of foundations and associations

Unlike Christian and Jewish institutions, nearly all Islamic organisations in the Netherlands have taken on the form of either a foundation (*stichting*) or an association (*vereniging*). Landman (1999) explains that adapting the legal form of either foundation or association by Islamic institutions is not the result of a principled rejection of the church as an institution. Instead, the cause of this development rests in the lack of legal clarity about the notion of church in Dutch law. Historically, the legal status of religious institutions is laid out in Dutch civil law. Churches, traditionally the dominant type of religious institutions in the Netherlands, are juridical persons and maintain a special position with a high level of autonomy (Landman 1999). The law states that: "churches as well as their independent parts and bodies through which they are united maintain legal personality. They are governed by their own statutes, as

long as they are not in conflict with the law." However, with the exception of article 5,[3] all other articles contained within this title (juridical persons) do not apply to churches.[4] Churches ('*kerkgenootschappen*') have a unique position from a legal perspective, since they do not have to adhere to most legal articles applicable to juridical persons (Santing-Wubs 2002, Witteveen, 1984).[5] This autonomy is largely the result of the separation of church and state. The separation of church and state as well as this high level of autonomy are possible reasons for the fact that the law does not outline a procedure which will lead an organisation to establish itself as a church. To complete certain transactions associated with legal actions, such as the purchase of a building, by a community or group of people need the legal status of juridical person. Thus, the choice of Islamic communities to opt for the introduction of either a foundation or an association was predominantly practical in nature according to Landman (1999).

Based on the data provided by Landman (1999), of the 500 Islamic institutions about 60 per cent were foundations, about 33 per cent, or a third, were associations and the remainder was unknown.[6] Landman (2014) describes how the first generation immigrants were often unfamiliar with the Dutch legal structure. This changed during the 1980s and the 1990s as individuals in the Muslim community introduced foundations for socio-cultural purposes to receive public funding specifically reserved for minority groups. These foundations would focus on the welfare of, for example, youth or women and would not have any religious affiliation in the name. This was to increase the possibility of receiving public funding.

In contemporary society, the organisational workings of Islamic organisations have become more explicit and have been formalised and codified in organisational statutes. According to Landman (2014), this is partially owing to a second generation of Muslim leaders who tend to be higher educated and possess a good level of knowledge of Dutch law and legislation. Moreover, the existence of national organisations with local subdivisions has required the formalisation of the distribution of roles between these levels of organisation. Landman (2014) describes how the organisational form taken by the religious lives of Muslims in the Netherlands is in large part determined by the judicial forms available according to Dutch civil law. Landman (2014) specifically states that due to the lack of a clearly defined and uniform organisational structure in Islam, Muslims use the foundation and association structure in the Netherlands. Landman (2014) emphasises that the foundation in particular is a legal form which offers sufficient discretion for a variety of types of organisational structures within the Islamic community, ranging from the more local to the more national focused.

---

[3] Article 5 states that juridical persons and natural persons have the same rights with respect to property law.

[4] See Art. 2 Burgerlijk Wetboek (BW) 2

[5] In civil law it is explicitly stated that the term '*kerkgenootschappen*' encompasses more than just Christian and Jewish religious communities (Santing-Wubs 2002). Buddhist and Islamic organisastions that have settled in the Netherlands are, in principle, also included (Witteveen 1984). However, since mosques and Islamic umbrella organisations are almost exclusively organised as foundations or associations (Landman 1999), in practice the term predominantly refers to Christian and Jewish institutions.

[6] More recent data with regard to percentages of associations and foundations has not been located by the study team.

Besides the flexibility offered by the legal structure of foundations in the Netherlands, the ease of introducing a foundation seems another appealing feature. In the Netherlands, starting a foundation only requires a notary declaration. Anyone who has the desire to introduce a foundation can do so without the cooperation of others. The only requirement besides the notary declaration is that the foundation must be registered with the national Chamber of Commerce (*Kamer van Koophandel*, KvK). Foundations are introduced for a variety of purposes but are often used for charity.

2.3.2. Challenges introduced through legal framework of foundations and associations

The flexibility and fairly limited reporting requirements associated with foundations may expose this type of legal entity to misuse. In a report prepared by the Financial Expertise Centre (FEC, 2004), foundations are identified as a type of institution which may be vulnerable to misuse for the purposes of terrorism financing. The report discusses that once a foundation has been set up, it is difficult to verify that the activities carried out by the foundation are in line with its original mission or in accordance with Dutch law. FEC (2004) notes how foundations can be misleading or be introduced as a legal instrument to cover up original intentions of particular persons or groups. Moreover, the title *foundation* gives the impression, unjustifiably so according to FEC (2004), of trust and reliability to outsiders, in particular funders. This impression may be because foundations are often associated with charities, at least in the Netherlands, and as such are generally perceived as positive.

The main vulnerability appears to be insufficient oversight or supervision. As noted by an interviewee (Kemps 2014), the underlying philosophy in the Netherlands with regard to the non-profit sector is to separate the sector from the government and encourage a self-regulatory approach with respect to governance of non-profits. As such, once foundations, along with other non-profits, such as associations, are introduced, there is limited external oversight for fiscal purposes. The actual activities, according to FEC (2004), can easily deviate from the original purpose as identified in the statutes of the foundation.

2.3.3. Oversight of foundations and associations

In the area of oversight of non-profit organisations, the Central Bureau for Fundraising (CBF) has a limited supervisory capacity. As noted on its website, '[i]n case a fundraising organisation without a 'trademark' (in Dutch: *keurmerk*) gives rise to negative publicity or otherwise leads to questions or complaints from the general public, the CBF shall take steps to collect information about the respective institution.'

Recently, there have been some developments, since the lack of supervision exercised over foundations continues to be an item on the political agenda. Minister Opstelten introduced a legislative bill in February 2014 to enhance oversight of foundations and associations, with a particular focus on board members and their activities. Unlike in private corporations with shareholders, as foundations do not have any members, there is no possibility to directly hold board members accountable. Through the bill, board members and supervisors of foundations and associations will have a better idea of what is to be expected from them. Moreover, if and when enacted the law will also allow board members to be held accountable for their actions and it will be easier to let go off poorly functioning board members and to replace them.

Box 2.1: International experiences in regulating charities

In the Dutch charity sector, financial transparency is primarily self-regulated. In an international context, some jurisdictions require automatic disclosure of foreign donations by charities, whilst others have no particular reporting requirements regarding their funding, independent of its origin. Here we briefly discuss some examples of these jurisdictions, identified through non-systematic search and suggestions from interviewed experts. While beyond of the scope of this study, we believe it is useful to highlight how other jurisdictions regulate the funding provided to charities and related institutions.

Our review suggests that certain jurisdictions, such as, for example, **Luxembourg**, base their recommendations and reporting requirements on the recommendations by the Financial Action Task Force (FATF). . FATF, an inter-governmental body established in 1989 by the ministers of its member jurisdictions, sets standards and promotes effective implementation of legal, regulatory and operational measures for combating money laundering, terrorist financing and other related threats to the integrity of the international financial system. In Luxembourg, charities, including foundations and associations, are required to seek authorization from the Ministry of Justice for donations above 30,000 Euros (Luxembourg Ministry of Justice 2015). In **Sweden**, on the other hand, charities are not required to disclose or report the source of their donations regardless of their origin, according to a representative from the Swedish Fundraising Control.

In the **United Kingdom**, the UK Charity Commission provides extensive guidance to charities with regards to its 'Know Your Donor' policy (UK Charity Commission 2014c). However, charities are not required to disclose donor details to the Commission. They are expected to monitor end use of funds and to report to the Commission any donations about which they have concerns. From 2015 onwards, charities will need to declare how much income they receive from grants or contracts with UK local or central government. This does not extend to grants received from international governments however (UK Charity Commission 2014a).Further, under the Charity Commission's requirement for charity trustees to report serious incidents, trustees of UK charities are required to report 'significant sums of money or other property donated to the charity from an unknown or unverified source' in particular if specific conditions are attached to the provision of these funds (amounts triggering concern are those greater than 25,000 GBP in total, as lump sum or tranches) (UK Charity Commission 2014c, 8).

In **Italy** and **France** concerns surrounding foreign financing, similar in nature to those in the Netherlands, have also culminated in the demand to provide a quantitative estimate of funding to Islamic institutions. However, forms of donor monitoring or reporting system do not seem to exist according to the responsible charity regulators (*Comité de la Charte* and *Istituto Italiano Donazione*). In the case of religious institutions, the *Comité de la Charte* states that French statutes specifically prohibit the monitoring of religious-oriented organisations.[7]

In October 2014, the **Austrian** government introduced a new bill prohibiting the foreign funding of mosque construction or of imams working in the country and requires a unified German-language translation of the Quran. The bill also proposes that the training and hiring of Muslim clerics be regulated (Austrian Parliament 2015, Gatestone Institute 2015).

In **Canada**, there are three types of registered charity: a charitable organisation, a public foundation, or a private foundation – the designation of a charity receives is determined by the authorities based on an assessment of its structure, source of funding, and its mode of operation. Key to gaining charitable status is to be deemed to have a 'charitable purpose,' which is defined as 'relief of poverty, advancement of education, advancement of religion, or certain other purposes beneficial to the community in a way the law regards as charitable.' (Canada Revenue Agency 2013).

[7] Statement provided by Comité de la Charte

As is the case in many countries, organisations that receive charitable status benefit from tax-advantaged status. Consequently in Canada, regulation and monitoring of the charitable sector is undertaken by the Charities Directorate within the Canada Revenue Agency (2011). With regards to the subject of this study, of particular interest is the basis on which registered status is maintained, in particular the need for charities to make certain annual filings (*form T3010*), which requires the disclosure of donation sources under certain circumstances. One specific section (*C10*) of this form asks:

'Did the charity receive any donations or gifts of any kind valued at 10,000 USD or more from any donor that was *not* resident in Canada and was not any of the following: a Canadian citizen; nor employed in Canada; nor carrying on a business in Canada; nor a person having disposed of taxable Canadian property?' (Canada Revenue Agency 2015, 2).

If a positive answer is given then additional, confidential disclosure must be made to the authorities for all donations in excess of 10,000 CAD, providing details of the name of the organisation, the value of the donation, and whether the donor is an organisation, government, or individual. This information is provided in the 'Confidential Data' section of form T3010 and is thus not publically available when the charity's accounts are published. The data however provide the Charities Directorate with clear oversight of the extent to which foreign funding is flowing into the Canadian charitable sector.

2.3.4. Public Benefit Organisations as a means to enhance transparency

The challenges introduced by the claimed lack of oversight of foundations and associations have been partially compensated through the introduction of and subsequent obligations associated with the fiscal designation of Public Benefit Organisations (PBOs) or *Algemeen Nut Beogende Instelling* (ANBI) in Dutch. To qualify as a PBO, the organisation must meet a number of criteria conditions (Belastingdienst 2014), for example: at least 90per cent of the institutions' efforts must be focused on the general good.

Due to the necessity for ANBIs to go in search of their own funding, the Dutch government, through the giving act, made the conditions for the engagement in commercial activity less restrictive for ANBIs (Pravesh 2014). The incentive to minimise barriers for private funders is enhanced by fiscal advantages of giving to ANBIs in the Netherlands. The tax exemptions include:

- Not paying Dutch inheritance tax or gift tax on inheritances or gifts that the institution allocates to the general good;
- Not paying Dutch gift tax on gifts that the institution makes for the general good; and
- Individuals and companies donating to a PBO may deduct their gifts from their Dutch income tax or corporate income tax.

With respect to reporting requirements, there are administrative obligations towards the Dutch tax administration. PBOs only have to file such a report or complete a *controleformulier* if mandated by the tax administration. If such a request occurs, PBOs must be able to report on the nature and size of the income they receive as well as the nature and size of the assets they maintain. Moreover, they must also be able to report the costs they have made in an effort to raise funds and the maintenance of the organisation as well as the nature and size of any other expenses. Other, for the purposes of this research perhaps less relevant, administrative obligations include reporting on the nature and size of reimbursements and holiday pay of board members. On request of the tax administration, the PBOs must also provide them with the opportunity to view their (financial) administration.

Islamic institutions that are foundations, voluntary associations or charities can apply to be considered PBOs. However, the majority of PBOs are foundations, rather than voluntary associations. Voluntary associations are more likely to be registered as *Sociaal belang behartigende instelling* where the organisation represents the interests of its members rather than the public good but still maintains societal value. If the Islamic institution is part of a *koepel* (i.e. umbrella organisation), registration by the *koepel* itself is sufficient.

Furthermore, as of 1 January 2014, PBOs are required to publish information on their websites. This information includes, amongst others, a financial justification such as account balance, income and costs and an accompanying explanation. This initiative was announced in a parliamentary letter in March 2009 and specifically refers to the necessity of more transparency with respect to foundations, including religious institutions such as mosques. Of the total 35,000 organisations that have an ANBI status, 2,000 did not comply with the request for information – specifically, the provision of a URL – and, as a result, lost their ANBI status in 2014 (Belastingdienst 2014).

Yet, religious institutions (*Kerkgenootschappen*) are exempt from this requirement until January 1, 2016. In the Netherlands, a distinction is made within the broad group of religious communities. This distinction is between parties of the *Interkerkelijk Contact in Overheidszaken* (CIO)-covenant that represents Jewish and Christian institutions (CIO 2014). Islamic institutions are also classified as religious institutions and hence, they have also been exempt from the publication requirement until 1 January 2016, along with members of the CIO-covenant. Besides this exemption, religious institutions are also exempt from publishing names of board members and have a more limited reporting requirement with respect to their financial data as compared to other ANBI institutions. Religious institutions, for example, do not have to publicly report their financial assets (Belastingdienst 2014).

Within the tax authority, a department oversees the ANBIs. Amongst others, members in the department analyse ANBI application forms, appeal procedures against rejected applications and court procedures in case of disputes about ANBI status. On an annual basis, the department determines the focus of its oversight efforts. Whilst the interviewees did not share what their current or recent focus was and is on, they did indicate how the focus tends not to be on religious bodies (Belastingdienst 2014).[8] In exceptional cases, completed application forms are cross-checked with the Fiscal Intelligence and Investigative Agency (*FIOD*). If no abnormalities or red flags arise, and the institutions also adhere to the other requirements, the institutions receive an ANBI status.

The oversight department also acts on complaints received about ANBIs. However, so far no complaints about foreign financing have been received. When there is doubt about activities carried out by ANBIs, the oversight department may request to see annual statements from the institution or organisation which carries an ANBI status.

[8] Interview with two Senior representatives of Tax Authorities (*Belastingdienst*).

2.4. Foreign funding of Islamic institutions in the Netherlands

While the legal and organisation context of Islamic institutions is therefore quite clear, much less is known about the extent of foreign financing to Islamic institutions in the Netherlands. Aside from incidental media or intelligence reports, there is no comprehensive overview of the size or character of such donations or other forms of funding from state(-affiliated) actors. This section briefly highlights some of these reports that have given rise to conducting this feasibility study. As will become clear however, the anecdotal nature of the evidence however, precludes any generalisations.

2.4.1. Reports of foreign funding to Islamic Institutions in the Netherlands

According to a letter from the then Minister of the Interior to Parliament (Ter Horst 2009),foreign governments (or non-governmental organisations (NGOs) closely linked to foreign governments) have been involved in financing of mosques in the Netherlands for the last few decades. The available literature provides limited insight into the details of such foreign financing. The Dutch National Intelligence Service (AIVD) published a report in 2004 which specifically focused on Saudi influences in the Netherlands, in particular connections between the Salafi movements, radicalisation processes and Islamic terrorism (AIVD 2004). The AIVD focused on foreign financing from Saudi Arabia to organisations around the world and stated that through the financing of, for example, “the building of mosques, initiating education projects, attracting imams, etc., the Saudi state tries to exert its influence over Muslim communities across the globe” (AIVD 2004). The report also concludes that the Saudi Ministry of Islamic Affairs finances imams who are part of the Salafi movement.

According to the AIVD, the influence of Saudi mission organisations is most apparent in four mosques. These are the Tawheed mosque in Amsterdam, Fourkaan mosque in Eindhoven, the Al Mouahidine mosque in Helmond and the *Stichting voor Islamitische Jongeren* in Breda. Besides these four, where the Saudi link and influence is most pronounced, the AIVD also indicates that there are an estimated several dozen additional mosques that are affiliated with the Saudi mission organisations but in a more covert manner.

In a letter written to the Dutch Parliament (Ter Horst 2009), the former Minister of the Interior describes that the government has observed that the Turkish and Moroccan governments maintain financial relationships with Mosques in the Netherlands. Besides the governments, the Minister also mentions that it has become apparent that Mosque boards have also called upon affluent individuals in the Gulf region for financing. Specific examples mentioned include the Essalam mosque in Rotterdam, which reportedly received funding from the Al Maktoum Foundation in the United Arab Emirates (UAE).

During a Parliamentary debate held in September 2013, the topic of foreign financing was discussed. Many of the claims made by Member of Parliament Van Klaveren reiterate points included in the letter to the Parliament written by Ter Horst in 2009 and the AIVD report. Van Klaveren, primarily citing media reports, claims foreign financing to mosques in the Netherlands comes from Turkey, Kuwait, United Arabic Emirates and Saudi Arabia. In 2013 Van Klaveren noted, on the basis of a news item published in the Dutch newspaper *Het Parool* (Soetenhorst 2013), that *de Blauwe* mosque in Amsterdam received two million Euros from the Muslim Brotherhood Al-Qarawi, through the Ministry of Religious Affairs in

Kuwait. This claim could not be verified by the Minister Asscher of Social Affairs and Employment (*SZW*). In his response, the Minister could only confirm that, based on contact with the board of de *Blauwe* mosque, the municipality of Amsterdam and conversations within the government, the Ministry of Religious Affairs from Kuwait provided 400.000 Euros for the building of de *Blauwe* mosque. Minister Asscher reported that this occurred through a foundation based in Rotterdam, known as the European Trust Network (ETN) (Asscher 2013).

Other institutions mentioned include the *Essalam* mosque in Rotterdam, the *Westermoskee* and the *El Tawheed* mosque in Amsterdam. The financial problems and controversy surrounding the construction of the *Essalam* mosque have been covered in the media (e.g. El Barkany 2007). In an interview on national TV, a representative of the Al Maktoum foundation confirmed a donation of 4 million Euros to the Dutch mosque (KRO Reporter 2007). Completion of the long overdue construction of the *Westermoskee* has been linked to funding from both Milli Görüş and Diyanet in a series of articles and news reports (KRO Reporter 2007, Soetenhorst 2015).

2.4.2. Examples of different forms of funding to Islamic institutions

Islamic institutions can be funded in different ways. Donations from funders based abroad are the most obvious form of foreign funding. Some examples of such (alleged) funding have been mentioned above. In general, according to the AIVD, there is a lack of transparency with respect to the origin and the destination of funds to mosques. There is a general lack of clarity about the way considerable expenses can be made in the area of maintenance of mosque buildings, energy costs, payment of the imams, library facilities, and organisation of conferences with foreign speakers and guests. According to the AIVD, cash payments are frequent, as well as 'mixed use' of bank accounts, which occurs when accounts are used both for business as well as personal use (AIVD 2004). Both of these developments appear to complicate the ability to gather information on financing.

In addition to donations, mosques and other Islamic organisations can be financially supported from abroad by in the form of individual allowances (*toelages*), particularly to imams. As mentioned in Section 2.2, Sunier and Landman (2014) note that this is a common instrument for Diyanet to exert influence on mosques. They report that mosque personnel are closely supervised by religious functionaries linked to the Turkish embassy and consulates.

wordt aangestuurd vanuit Turkije via religieuze functionarissen die aan de Turkse ambassade en consulaten zijn verbonden. Deze houden toezicht op het functioneren van plaatselijke bestuurders. Financiering van het salaris van de imams is een belangrijk instrument van controle

The AIVD has also received ad-hoc signs that a small number of imams receive financial support from the Saudi embassy. The AIVD, however, also describes the countermeasures taken by the Saudi government after the Al-Qa'ida suicide attacks in Riyad in May and subsequent attacks in November 2003. The Kingdom officially forbids giving money to recipients abroad, in part to prevent the potential indirect financing of terrorist activities through funding of overseas Islamic institutions. As the AIVD describes, charities, or charitable organisations, have had to consolidate their bank accounts into one account for all their expenses to increase transparency. Saudi Arabia also introduced new anti-money laundering initiatives and authorities now exercise more supervision over money transfer systems (AIVD, 2004). All

requests for financing must go to the embassies and must be discussed with the host countries. The AIVD notes how the countermeasures, if implemented, shall enhance transparency. The Saudi ambassador to the Netherlands vowed to provide complete transparency to the Dutch government on the financing of institutions as well as imams (AIVD 2004).

Overall, the evidence of foreign funding of Islamic institutions in the Netherlands is largely anecdotal and based upon a relatively small number of individual cases, rather than on a systematic assessment of Islamic institutions. As such, no general conclusions can as yet be drawn from the evidence available through these sources.

3. Islam and Finance

The position of Islam in the Netherlands, and specifically the position of Islamic institutions in the Netherlands as outlined in the former chapter indicate that while the legal and organisational structures are relatively well understood, much less is known about the extent of possible foreign financing. The next step to understand the wider environment of Islamic institutions requires us to briefly outline how streams of funding within the Islamic world could come about. This chapter therefore outlines a number of principles regulating finance and funding within Islam (3.1) and proposes potential funders, beyond the state-actors that are the focus of this study, such as international aid organisations (3.2). Finally, in order to place Islamic finance in the wider context, we will briefly review the funding landscape of other religions in the West (Box 3.1).

3.1. The principles regulating finance in Islam

The principles regulating finance in Islam are as old as the religion itself. As for several other issues, Islamic principles regulating finance stem from the Quran, prophetic Hadiths and from the opinion of Islamic jurisprudence (*fiqh*) scholars. These principles may be implemented in many forms, but a number of unaltered basic concepts function as bedrock of modern Islamic finance. With regards to this, it is worth mentioning the three key prohibitions of *gharar, maysir* and *riba*. The word '*gharar*' can be translated as 'risk' or 'hazard' and refers to a set of practices prohibited by Quranic and prophetic prescriptions. In particular, the prohibition over risk and hazard is implemented in Islamic finance through a prohibition of transactions marred by a strong degree of uncertainty as to their ultimate outcome. This concept determines that contracts must be unconditional, implying that they may not include a resolutory condition, which would terminate existing rights and obligations.[9]

The concept of '*maysir'* refers to prohibition of gambling and of practices where the gain of one side is determined by the loss of the other. In financial terms, this has led to the aversion of Islamic finance for conventional insurance and derivative products. Lastly, '*riba*' is an Arabic word variously translated as 'usury' or 'interest'. This concept is prohibited in the Quran and its interpretation and the extent to which it applies to modern financial transactions constitutes one of the fundamental tensions between classical Western finance and its Islamic counterpart (Chibli 2007).

[9] This has implications for, for instance, real estate contracts, which, according to this principle, cannot include resolutory conditions regarding a potential failure to finance of the purchase. In practice, this implies that the financier will act as purchaser on behalf of the property's new owner and in turn will allow the buyer to pay off the amount in terms (Visser 2015, pers. comm.).

The above outlined principles may reflect practically over the mechanisms that can be used for fund raising, through which donors make contributions that may, in part, benefit religious institutions in the West, support Muslim communities in overseas countries, and fund the furtherance of a particular strand of Islam.

3.1.1. Zakat

Zakat, specifically *Zakat mal*, is a form of wealth tax imposed upon Muslims enshrined in the Quran and Hadiths, and represents one of the five pillars of Islam. Individuals are taxed on selected productive assets, with 2.5per cent being the generally accepted tax rate (Visser 2010, 27). The onus for Zakat compliance is typically upon the individual, although Islamic countries have at times made Zakat compulsory for all citizens (Abbas 2005, 113), and individuals retain the ultimate discretion as to which individual or institution receives their taxes. The 'best' recipients of Zakat funds is a hotly contested topic, with the Salafis placing particular emphasis on Zakat funding being directed to Islamic institutions in non-Islamic societies (Visser 2010). By contrast, Islamic charities such as Islamic Relief and Muslim Aid are active in aggregating Zakat funds from large groups of individuals and distributing them to particular causes, particularly in a humanitarian capacity and not restricted to causes in Muslim countries.[10] Although most Zakat charities focus on humanitarian projects, some organizations such as Islamic Aid allow individuals to donate their *Zakat* alms to mosque construction projects in western countries (Islamic Aid, n.d.).

As set out in the terms of reference, this feasibility study has focused exclusively on foreign funding by state entities provided to Islamic institutions.

3.1.2. Sadaqah

In contrast to the 'compulsory' nature of Zakat, *sadaqah* is a form of voluntary charity in Islam. It is considered proof one one's faith. *Sadaqah* is not necessarily only provided in the form of money. The contribution can be in knowledge, effort, or generally helping and enriching others. The giver is encouraged to remain anonymous, as, based on the Islamic teachings, *sadaqah* is to be given for the pleasure of Allah and not to gain praise or recognition. Some charity organizations offer to distribute *sadaqah* on behalf of the giver.[11] However, *sadaqah* can also be collected through various platforms, including publically through organized media efforts. *Sadaqah*-TV[12] in the Netherlands, for example, is a platform which provides a number of instruments for Islamic organisations to raise funds and donations. They assist mosques in raising money to finance projects, such as a construction project or other types of humanitarian character assistance. When mandated on an eligible Muslim, *sadaqah* is called Zakat; however, unlike with Zakat, there is a total flexibility with regards to beneficiaries of *sadaqah* (Zawya Islamic).In general, voluntary donations falling under the definition of *sadaqah* are relevant to the scope of this study in the measure by which they are collected by source-countries state bodies or state-registered

[10] Interviews with staff members of Islamic Relief Worldwide and Muslim Aid.

[11] See: http://ukisif.com/donate-isi-foundation.html as of November 2014.

[12] See: SadaqaTV (2015).

charities that are then involved with mosques building and support programmes on the international scene in general and in the Netherlands in particular (Atia 2010).

3.1.3. Waqf

Waqf is another Islamic financial instrument, which functions as an endowment designed to produce annuity revenues towards a charitable objective in perpetuity. Typically, the *waqf* is a religious endowment in the form of contributing property towards an Islamic purpose, with the founder being able to determine the management structure and general conditions on the endowment (Ahmed 2007). While *awqaf*[13] are often granted by private individuals, foreign countries have established institutions through which its citizens can undertake *waqf* projects in the west. For instance, the *Waqf* Foundation was first established in the Netherlands by the Kuwaiti government as a means to provide an organization through which Kuwaiti officials and citizens can direct *waqf* funds into the Netherlands for the construction of schools and Islamic centres.

3.1.4. Hawala

A further concept that is often associated with the giving and transfering money in the context of Muslim-majority countries is *hawala*. While *waqf*, *sadaqah* and Zakat are broadly considered traditional Islamic instruments based on philanthropy through which funds can be contributed to institutions abroad (Zawya Islamic 2014), the *hawala* system is a modern remittance method used to transfer funds internationally, similar to the type of service offered by companies such as Western Union and Moneygram but operated on an informal basis founded on trust and reputation. Diaspora populations in the west are generous remitters of funds to family members in their country of origin and it is the *hawala* system that often provides the mechanism by which such funds are remitted home. In short, *hawala* systems are transnational networks thatrely on individuals depositing money to a broker in one country, with a member of the *hawala* network in another country making an equal amount of funds available to a receiving individual in that other country (Pathak 2003). Payments transferred between *hawaladars* (i.e. hawala dealers) are then balanced out through invoice-manipulation or other trade *escamotage* on import-export transactions between the businesses run by the *hawaladars* involved in the transaction (Jost & Sandhu 2003). More broadly, it is should be considered that *hawala* remains a highly flexible and ever-changing method for transfer of funds that is constantly adapting to challenges and opportunities arising in its environment (FATF 2013). Since *hawala* does not involve the physical or electronic transfer of funds, it is free from accounting restrictions and taxation, with most western countries either outlawing it or attempting to impose greater regulation (FATF 2013). *Hawala* operators have been banned in the Netherlands, although there is evidence that they are widespread on the irregular market (Passas 2009). Our review suggests that it is highly unlikely that the use of *hawala* systems is linked to the financing of Islamic institutions in the Netherlands or elsewhere as typically *hawala* is used to send money from the west to Diaspora-origin countries, not vice versa. Nevertheless, *hawala* brokers are prevalent amongst several Diasporas in the Netherlands, particularly the Iranian and Turkish communities (El Qorchi et al.

[13] *Awqaf* is an Arabic language plural of *waqf*.

2003, 50) and the use of this system and other forms of informal value transfer mechanisms has been of interest to authorities such as the Financial Intelligence Unit.[14]

3.2. Muslim aid organisations

There is a wide community of international organisations that facilitate financial transactions according to the principles of finance and funding in Islam. While the focus of the current study is on State actors, it would be an oversight to ignore these aid organisations completely. Therefore, even if we cannot, within the scope of this study, address international organisations systematically, it is worth mentioning them as part of the wider environment within which Islamic institutions in the Netherlands are situated.

The emphasis on charitable giving enshrined in Islam through the concepts of Zakat, *sadaqah* and *waqf* has throughout history had significant implications, encouraging the development of a large body of Muslim aid organisations and funds (Benthall, 2003). This occurred especially during the second half of the twentieth century, across both Muslim majority countries and Diaspora Muslim communities living in the West. It should be stressed that no 'Islamist International' coordinating the efforts of these charities exists, nor do these organisations act as a monolithic whole, if anything due to the highly heterogeneous nature of said organisations and of the approaches and goals underpinning their work (Benthall 2003). In principle, Muslim faith-based charities and aid groups are organisations constituted on the initiative of Muslims with the aim to support and assist various categories of disadvantaged individuals, in most cases Muslims themselves (Benthall 2003, De Cordier 2003). Although these organisations often employ a religious hue to foster resource mobilisation among Muslim donor communities, it would be an overstatement to assume that the whole of them maintains a religious agenda at the basis of their work (De Cordier 2009). De Cordier (2009), for example, stresses the key difference between groups with a religious agenda using humanitarian aid as a vector to pursue it, and humanitarian organisations inspired by religious values in their work. In general, it is possible to identify a number of recurrent thematic areas of work for these organisations, namely: assistance to orphans; assistance to refugees and displaced people; humanitarian relief; gender programmes; religious programmes (Benthall 2003).

Furthermore, for the purpose of this study, it should be stressed that from an organisational point of view, Muslim faith-based organisations encompass state-run charities, state-affiliated international organisations as well as non-governmental organisations. The latter group is present not only in Muslim majority countries, but also among Muslim Diaspora communities in the West. Muslim faith-based organisations have come under strong scrutiny in the West since in the early 1990s some of them were found to be channelling funds towards politically and religiously motivated armed groups and factions active in the war in Bosnia. This scrutiny was further reinforced after the events of 9/11 and the realisation that in some instances the international transfer of funds towards terrorist groups and militants happened through deceitful Islamic charities' accounts (De Cordier 2009).

[14] For greater detail on this topic see: FATF (2013).

Box 3.1: Funding landscape of other religions in the west.

Civil society groups appear to play a much stronger role than (foreign) governments in funding other religions' institutions in the West. This may be both due to an absence of government funding and the existence of strong philanthropic traditions. Numerous studies of philanthropy show that the motivation behind charitable giving can be segmented into various categories. Charitable organisations often identify their target groups accordingly, such as religiosity, group loyalty, awareness of need, solicitation, reputation, and efficacy (Bekkers & Wiepking 2011). As well as targeting particular segments of the population to raise funding, non-profit charity organisations also emerge to meet the needs of specific target groups, based on factors such as religion (e.g Anheier & Salamon 1998, Ilchman et al. 1998, James 1989, Smith et al. 1996). The equivalent of such faith-based philanthropy (*Zakat* for Muslims) among Hindus is called *Daan* or *Seva* and giving of *alms* among Christians.

For faith-based philanthropy, it is however difficult to make generalisations between or even within religions. Ferris (2011) notes that differences between faith-based actors are often greater than those between secular and faith-based organizations. Bekkers and Wiepking (2011) explain that survey research also suggests a negative correlation between the size of congregations and religious contributions, while other research confirms a link between peer pressure and the level of donations. Members of smaller congregations thus tend to give more.

In terms of state funding for religious organisations in the Netherlands, churches and other religious institutions traditionally receive government grants to implement developmental activities. Christian charities and NGOs, such as ICCO and the Salvation Army (*Het Leger des Heils*) receive government grants to engage in humanitarian aid and disaster relief abroad. While these organizations also engage in proselytizing activities such as constructing churches and conducting religious missions, these activities are compartmentalized from the areas which receive government funding; this separation is often enforced by legal limitations on governmental funding of faith-based activities. There are also numerous examples of public sector funding to religious institutions in the context of preserving or restoring cultural heritage. For example, the European Union's European Regional Development Fund (ERDF) granted 1.41 million Euros to renovate two historic synagogues in Hungary and Romania and transform them into cultural and tourist information centres (Jewish Herritage Europe 2013).

Western countries have historically been a source, rather than a recipient, of faith-based foreign donations (Hergueux 2011). Increased migration to western countries since the mid-20th century, however, has lead to an increase of religious institutions frequented by various sending countries' Diasporas (Levitt 2003), with large discrepancies amongst countries regarding whether and how they fund religious institutions abroad. World Bank estimates (The World Bank 2011) confirm that the large majority of worldwide Diaspora remittances to families and communities in their countries of origin went to developing countries: 209 billion USD out of a total figure of 275 billion USD.

In addition to supporting charitable causes, there are reports of Diaspora groups' support to, sometimes violent, nationalistic or independence movements. Flanigana (2006) cites some examples, such as: Irish American support of the IRA (Werbner 2002), support of Hindu Nationalist movements by Asian Indians in the United States (Anand 2004), and support for violent Greek Cypriot separatism (Anthias 1998).

One example of Diaspora fundraising for independence movements *outside* the West is the case of the Tamil Tigers (LTTE). There have been reports on the influence and control by Tamil separatists in Sri Lanka of Hindu temples in western countries, such as Australia, Canada and the UK (HRW 2006). The Toronto area has approximately forty Hindu temples attended by Sri Lankan Tamils; London has twenty-two. Human Rights Watch (HRW 2006) has documented several reports of efforts by the Tamil Tigers to take over the management structures of local

temples in order to extort and pressure local temple-goers to donate funds supporting the separatist struggle in north Sri Lanka (HRW).

Funding to religious (non-Muslim) Diasporas in Western countries does not appear to occur regularly. Christian-majority countries, for instance, do not appear to engage in financing their Christian Diasporas in western countries. Similarly, we have identified little evidence of funding from state actors abroad to other religious communities in Western countries. While the Israeli Ministry of Religious Services claims to focus on enhancing religious ties with the Jewish Diaspora for instance, this appears to take the form of non-financial support. Moreover, we were not able to identify any indications of an institution-funding mechanism. The only identified available documentation on Israeli institutional funding in the West illustrates that while Diaspora-driven organisations, such as the Avi Chai Foundation in the United States or Jewish Heritage in the UK, often provide grants to Jewish religious institutions (The United Synagogue of Conservative Judaism (homepage) 2015), there are no funding mechanisms in place by Israel or any other country with a significant Jewish population to fund religious institutions in the West.

4. Methodology

As outlined in the previous chapter, this study aims to generate an insight into potential foreign funding of, and influence on, religious institutions in the Netherlands. In order to get a rounded picture of the data available on this topic and to assess the feasibility of a full study into the research questions, we relied on a multi-method approach. To ensure that we maximize the information that we can find on source countries and recipient institutions we have tailored the methodology to each of these individually. Thus, the method of data collection for source countries differs from the method of data collection for recipient institutions. Table 4.1 provides an overview of the methods used. In this chapter we will briefly explain the various methods used. Additional details are included in Appendix A.

Table 4.1: Overview of multi-method approach

Scoping and background	
• Key informant interviews: to assess the available data and evidence • Document review: to assess the available data and evidence	
Source country analysis	**Sources of information on Islamic institutions**
Document review Online search engine queries	Exploration of available data through sample of institutions. Consulting: • Annual reports • Court cases • Land Registry • Chamber of Commerce • Construction permits from municipalities • Police and prosecutor files • Online search engine queries
Reference religions	
• Quick scan of available literature • Key informant interviews	

4.1. Scoping the available data: interviews and document review

We relied on a number of interviews as well as a review of mainly grey literature to get an understanding of the sources and the type of data that are available in the public domain and that are relevant to the research questions. The interviews and the document review thereby served a scoping purpose to map the landscape of available data and to ensure that we did not miss important sources of publicly available data. Both the interviews and the document review were conducted for the Dutch as well as the international context.

4.1.1. Interviews

Several interviews were conducted with experts and representatives of public sector institutions in the Netherlands and internationally. Interviews w provided background information to our study and to guide us to available public data. A list of interviewees and other individuals consulted as part of the study is provided in Appendix C.

International experts and experts in the Netherlands were identified from the research team's own professional and academic networks, from the literature and from suggestions by the steering committee members. These key informants provided background information on the source countries analysed in this study. Interview candidates from public sector institutions in the Netherlands were identified on the basis of the potential relevance of the available public sector information. They suggested other interview candidates on the basis of their expertise as well. As such, the information gathered through the interviews does not in itself constitute part of the 'findings' of this study, yet has been conducive to identifying sources of information that do yield findings.

4.1.2. Document review

In addition to the interviews, we conducted a review of Dutch literature to understand the existing knowledge on foreign financing and to locate sources of public data. Literature was identified through the use of search strings in both Google and Google Scholar. Generally, at least the first fifty results of each search were scanned. However, flexibility was retained so as to scan more results according to the relevance to our areas of interest of the first results.

Table 4.2: List of initial search strings employed in Dutch (August 2014)

Strings Employed
Financiering AND Islam AND regulering AND donatie AND moskee
Financiering AND Islam AND regulering AND donatie AND moskee bouw
Financiering AND Islam AND regulering AND donatie AND moskee AND Zakat
Financiering AND Islam AND regulering AND donatie AND moskee AND waqf
Financiering AND Islam AND regulering AND donatie AND moskee AND sadaqah
Financiering AND Islam AND regulering AND donatie AND moskee AND hawala
Financiering AND Islam AND Moskee OR Zakat OR waqf OR sadaqah OR hawala
Buitenlandse financiering AND Islam AND Moskee OR bouw OR Zakat OR waqf OR sadaqah OR hawala

On the basis of the searches we identified over 40 documents that touch on the subject of the (foreign) financing of mosques.[15] These documents have been used to inform both the background of the study (Chapter 3) and the identification of data sources.

4.2. Recipient institutions: random and purposive sample

As previously mentioned, the total number of mosques in the Netherlands is estimated at 450, of which 242 (54 per cent) are Turkish and 179 (40 per cent) are Moroccan. Of all Turkish mosques, 75 per cent belong either to *Diyanet* or *Milli Görüş*. We created a long-list of mosques in the Netherlands compiled using information from different sources. On the basis of these lists, complemented with any additional mosque encountered in the document review, the long-list (cleaned of duplicates) contained 355 unique mosques (see Table 4.3). Therefore, our list does not contain all mosques in the Netherlands and is likely to over-represent mosques from *Diyanet* or *Milli Görüş* as complete lists are available from these organisations. Additionally, following the Motion by Yűcel, Azmani and Heerma (Tweede Kamer 2013), two higher education institutes have been incorporated in the long-list of institutions.

Table 4.3: Sources of the long-list of mosques in the Netherlands

Source	Number of Mosques (includes double counting)
Belastingdienst (ANBI search term: 'moskee')	167
Moskeewijzer (Moskeewijzer.nl 2010)	174
Milli Görüş	21
Contactorgaan Moslims en Overheid	94

This study focuses on mosques and higher education institutions in the Netherlands. As part of this study it would be infeasible to request, collect and analyse available information of all institutions on the long-list. Since the primary objective of this study is to assess the feasibility of conducting a comprehensive analysis, we assessed the information available from a variety of sources for a subset of 39 institutions.

Two samples were created. The first sample is drawn from a set of mosques and HEIs that are of particular interest in the context of this study. This sample was drawn to ensure that high-profile institutions or these of particular interest (but not representative of the wider community) are covered. we assumed that, given their higher profile, data or information may more likely be available on this group. The selection criteria are outlined below.

To minimising the selection bias, the second sample consists of a random selection of institutions from the long-list. Information collected about this sample may be representative for the institutions on the

[15] These initial and generic searches focused exclusively on mosques, as requested in the Motion Segers (Tweede Kamer 2012). The inclusion of the two higher education institutes as requested in the Motion Yűcel, Azmani and Heerma (Tweede Kamer 2013) have been incorporated in the assessment of the purposive sample, see Section 4.2.1.

long-list. The combination of the two samples aims to generate a balanced overview of the data available from public institutions.

We requested information for the institutions on these two samples from various public sector institutions with the aim to systematically review the kind of information available on potential foreign funding of Islamic institutions in the Netherlands. The samples were used to collect data from the Land Registry (Kadaster), the Chamber of Commerce (Kamer van Koophandel), and were used to check online search engines and data bases, as explained in Section 4.3.

4.2.1. Purposive sample

The so-called purposive sample was created to ensure that a variety of mosques and HEIs were included that are of particular interest for a variety of reasons. We identified institutions that have featured prominently in the media for positive or negative reasons (including stories related to potential foreign funding). While the purposive sample does not aim to be representative, we have tried to balance the selection across a number of dimensions, such as their location (Randstad vs non-Randstad), the size of the city, the background of the institution (Sunni vs Shia) and the Islamic community to which they belong (e.g. Turkish, Moroccan).

As Table 4.4 shows, the purposive sample includes the two higher education institutions and 17 mosques.[16]

Table 4.4: Purposive sample characteristics (contains double counting)

	Total	Higher Education	Explicit Shia	Moroccan	Turkish
Amsterdam	4			1	1
Rotterdam	4	2		1	1
Den Haag	3		1	1	1
Cities 100.000 – 200.000	5			4	1
Cities 50.000 – 100.000	2		1	1	
Towns 10.000 – 50.000	1			1	
Total	19	2	2	9	4

4.2.2. Random sample

From the long-list, 20 Islamic institutions were selected to create the random sample. Some of the characteristics of the selected random institutions are listed in Table 4.5. To our best knowledge, the composition of the sample is largely in line with the overall profile of mosques in the Netherlands.

[16] As the purposive sample contained an entry also included in the random sample, but under a different name, this entry was excluded from the purposive sample. Thus the purposive sample contains 19 institutions.

Turkish and Moroccan mosques make up 18 out of the 20 institutions in the random sample, (roughly corresponding to the estimated 94 per cent in the total population). Nine out of ten Turkish mosques in the random sample belong either to *Diyanet* or *Milli Görüş*, which is slightly higher than the actual figure of 75 per cent. This slight overrepresentation is likely to be the result of the list of mosques which we used to sample institutions.

Table 4.5: Random sample characteristics

	Total	Moroccan	Turkish		Other
			Diyanet or Milli Görüs	Other Turkish	
Cities 200.000 or more	3	2	1	0	0
Cities 100.000-200.000	5	1	1	1	2
Cities 50.000 – 100.000	6	3	3	0	0
Towns up to 50.000	6	2	4	0	0
Total	20	8	9	1	2

4.2.3. Use of the samples: data collection

The samples were used to understand the type of information that is available from a range of public sources. Combined, the data for the random and purposive sample can provide us with a sense of the scale and scope of public information available and how it can help us to address the research questions. Using this sample, we 'tested' a number of potential data sources available in the public domain. Table 4.6 provides an overview of the sources and the data that was available through them. A discussion of the anonymised results is provided in Chapters 5 and 6. We do not name individual institutions in discussing these results for two reasons: first, it is not relevant for addressing the questions related to the feasibility of conducting a comprehensive assessment; second, to avoid unnecessarily disclosing potentially sensitive information on individual institutions. In this section we will discuss the methodology underlying the approach to each source.

Table 4.6: Overview of sources and data collected for the sample institutions

Source	Data available for number of institutions in:	
	Random sample	Purposive sample
Annual reports – websites and Google (advanced) search	0	1
Court cases – (Rechtspraak.nl)	N/A[A]	N/A[A]
Land Registry (Kadaster)	20	17
Chamber of Commerce (Kamer van Koophandel)	19	17
Permits from municipalities	1	8
Police records	Not available[B]	Not available[B]
Public prosecutor files	Not analysed	Not analysed
General web searches – Google	N/A[A]	N/A[A]

NOTES: A) "N/A" refers to "not applicable". As not every court case or internet 'hit' is relevant in the context of this study, providing a number in this table could give a distorted view. The results of these searches will be discussed in Chapter 5 and 6. B) Data from the Police were not made available within the timespan of this study, and could therefore not be used.

Annual reports

In order to locate publicly available annual reports for the random and purposive sample, an initial search through Google was conducted to identify the websites of these institutions and organisations. Secondly, the identified websites were consulted to locate annual reports as well as other relevant information on financial transactions. To ensure the full website was captured in this search, an additional search using Google Advanced Search (http://www.google.com/advanced_search) – which enables searching *within* websites – was conducted using the search terms 'jaarverslag' and 'jaarverslagen'. Finally, a general Google search was undertaken to check whether any annual reports from the relevant institutions and organisations were available through other online sources. Search terms included [name of organisation] and 'jaarverslag' (or 'annual report' if applicable).

Court cases

Court cases were identified through running the names of the sample institutions through the search engine of the Dutch court cases' database named Rechtspraak.nl (http://uitspraken.rechtspraak.nl/). Where relevant, different spelling options were used to minimise the risk of excluding relevant court cases relating to these institutions and/or organisations.

Land registry (*Kadaster*)

The samples were shared with the Land Registry who provided general reports for each of the addresses at which the institution or organisation are registered. The data requested however did not include historical overviews of changes in ownership for each address requested. Where information was available for the requested addresses, we generally received two reports per address:

- *Kadastraal bericht object*: this document contains a general overview of the address and lists the owner and any leasehold on the address.
- *Hypothecair bericht object*: this document contains any mortgages that have been registered for the address.

Chamber of Commerce (*Kamer van Koophandel*)

In the same way that the samples were shared with the Land Registry, the samples were shared with the Chamber of Commerce to request any information publicly available for the institutions listed. The data includes changes in board membership over time, and thus includes a temporal perspective of changes at the institutions in the samples.

Construction permits from municipalities (*Bouwvergunningen*)

The Dutch Housing Act ("*Woningwet*") determines that in order to build a new structure or amend an existing one, a building permit ("*bouwvergunning*") is required in the Netherlands. A request is filed with the local municipality, where the construction plan is assessed on a set of criteria, including the municipal development plan ("*bestemmingsplan*"). Since 2010, the building permits have been replaced by more encompassing integrated physical environment permits ("*omgevingsvergunning*"). As the institutions in our two samples cover a total of 28 municipalities, we decided to approach only those two local municipalities with the largest number of institutions in the combined sample, five and four respectively. This creates a potential bias towards institutions in larger cities. However, within the scope of this study, it was not feasible to approach all 28.

We approached the building permit departments at the two municipal offices and shared addresses of the premises for the nine institutions in our sample. We were given access to the archive records in both municipalities and allowed to search the historical building permit requests for the nine addresses. We restricted our search to those permit requests since the year 2000. In City A, we were asked to visit the municipal archives and were allowed access to all records for those addresses. However, the municipal administrators were unable to fulfil this request for integrated physical environment permits (since 2010). For City B, our researchers were sent copies of the permit request forms only.

Police records and prosecutor files

We filed a request to the prosecutor service to access files from the national police (records, complaints filed, arrests, etc.) in relation to the institutions in our two samples that might hint at any potential financial crimes or indications of potential influence from foreign funders. We specified a set of offences to be used as search or filter terms in combination with the names of the 39 sample institutions. The resulting file numbers would then be used as queries in the public prosecutor database. This would allow us to follow through and analyse records of the (suspected) crimes, offences or wrongful acts that are of interest in which any of the sample institutions are mentioned.

Whilst we received a positive response from the public prosecutor's office, our request to the national police has never been answered in spite of various follow up requests and involvement of the WODC. Due to the absence of available police file numbers, we were unable to conduct queries in the public prosecutor database.

Additional internet searches

Additional internet searches using Google were conducted to ensure all publicly available information on possible foreign financing of the sample institutions was captured, as well as potential information on conditions related to funding. As such, the following search key was used: [name institution]

"financiering" [*names of the source countries*]. When this resulted in unrelated website links, the search key was broadened to: [name institution] 'financiering'. Only the first fifty results were examined for this search.

Umbrella organisations

The Islamic community in the Netherlands, especially the Turkish community, is characterised by a number of often influential umbrella organisations which cover dozens of mosques. To overlook these umbrella organisations would create a lacuna in our study, and thus, where possible, searches have also been conducted on the umbrella organisations in addition to the examination of the random and purposive sample. In total, we conducted additional searches for 21 umbrella organisations, and will report on the findings alongside the findings for the samples.

4.3. Source country analysis

As requested in the terms of reference, we reviewed publicly available information in potential source countries. This analysis aims to triangulate the information on foreign funding to Islamic institutions collected in the Netherlands with that available from funding countries, potentially improving its reliability. Where this information is unavailable in the Netherlands it may complement the analysis on recipient institutions. We have taken a systematic and consistent approach to reviewing publicly available information in the selected countries, which is outlined in more detail in Appendix A.3.

The selection of source countries for in-depth analysis was based on three criteria:

- Countries mentioned in a 2009 letter from the Dutch Ministry of Interior: Saudi Arabia, UAE, Turkey, Morocco (Minister of Interior Affairs and Kingdom Relations 2009);
- Census and survey data to identify the proportion of the Muslim population in Netherlands that is of each origin: Turkey (40.5per cent), Morocco (35.6per cent); and
- Online research of (international) publicly available information on international charity by Islamic countries and discussions with individuals knowledgeable in this field. In addition to suggestions from experts, international sources suggest several Islamic countries as major contributors to humanitarian and charitable efforts. The countries that are in the global top-30 in terms of contributions are: Turkey, Qatar, Kuwait, UAE and Saudi Arabia (Global Humanitarian Assistance 2013).

These three criteria lead to a list of six countries: **Kuwait**, **Morocco**, **Qatar**, **Saudi Arabia**, **Turkey** and **Saudi Arabia**.

4.4. Triangulation and reliability

To assess the reliability of the data gathered, the methodology allowed for data to be triangulated. In this context, triangulation refers to the use of different methods and data sources to verify findings and to increase the accuracy of the results. The two samples are at the heart of triangulation in this study, as they allow us to 'track' individual institutions through a number of different data sources. Information

gathered on an institution through one source can thereby be triangulated with data from other sources. Apart from confirmation of findings however, triangulation also helps to identify potential 'false positives'.

In cases where data points appear to be in conflict with one another, we have relied on a 'cascading reliability' whereby the nature and number of sources are reviewed to determine the most reliable interpretation of the data.

5. The feasibility of assessing the size and scope of foreign funding to Islamic institutions in the Netherlands

In this chapter we review the available data, from the data sources and with the methodology set out in the previous chapter, that may provide information on the potential scope and size of foreign funding to Islamic institutions in the Netherlands For each of the data sources, we have used the sample of institutions described in Chapter 4.

Using the two samples, we collected data on several aspects of Islamic institutions that might provide information on the size and scope of foreign funding. Rather that listing each data source individually however, this chapter addresses the aspects of Islamic institutions that can be studied through the data. Thus, in this chapter we examine the following aspects of Islamic institutions: ownership, financial status (solvency) and financial transactions. In addition, we examine several data sources that may provide indications of the presence of foreign funding and thereby might serve as proxies for this.

For each aspect, we list the type of data and public source that can be used to understand this aspect. In turn, for each type of data we discuss the results and findings (where relevant based on the sample), the limitations of the data and analysis, and the information that could be obtained if a comprehensive study was carried out.

Finally, for each data source we make an assessment of what could be learned about the size and scope of funding of Islamic institutions in all public data we obtained, not just for the sample. The structure of the chapter and the data sources used are summarised in Table 5.1.

Table 5.1: Structure of Chapter 5 and indicators and data sources discussed

Aspect	Indicators	Data
Ownership	Legal owners Mortgages	Land Registry
Financial Status	Solvency	Tax Authority – ANBI Annual Reports General web searches
Financial transactions	Transactions to mosques: bank transfer, cash	Banks: account transactions (*not public*) Cash sums reported to customs
Proxies for funding		Construction permits Court cases Police and prosecutor data

5.1. Ownership

Ownership arrangements can inform us about which persons/entities are registered as the owners of an address, and thus can also inform us if foreign parties were involved, either as owners of the address or as financiers through a mortgage. It is known from the existing literature that substantial differences in ownership arrangements exist between the Turkish and the Moroccan community in the Netherlands. Whereas Moroccan mosques are generally autonomous and locally owned by a charity or foundation, Turkish mosques are often part of larger umbrella organisations, such as Diyanet or Milli Görüş, which also own the local mosques (Landman 2014). Data on ownership can therefore shed some light on wider links to umbrella organisations and possibly on links with other governments.

5.1.1. Land registry data

Data from the Land Registry (Kadaster) was requested to understand the ownership arrangement of the institutions in the samples. The Kadaster is the Dutch authority on land registry that has operated as an independent public body falling under the authority of the current Ministry of Infrastructure and the Environment since 1994. The Kadaster maintains the registration of properties and geo-information in the Netherlands and thus also holds information on ownership and possible mortgages for each address in the Netherlands. By linking the institutions in the sample to addresses, an attempt can be made to understand the ownership arrangements of the institutions in the sample. This information can give us a sense of the involvement of foreign persons or entities in the financing of the buildings of religious institutions in the Netherlands.

While the information from the Kadaster is informative, there are limitations regarding the extent to which we can determine ownership or the presence of external funding. First, not all institutions actually

own but rent the property where they are located, in which case ownership of the location is uninformative. Second, even if (foreign) parties are listed as owners or mortgage holders, this still need not imply that there was any substantial external funding or external influence.

The Kadaster was able to provide us with information for 20 institutions from the random sample and 17 institutions from the purposive sample. In the cases where the information could not be provided by the Kadaster, as it may not have been logged yet. The data provided per institution consisted generally of two parts:

- *Kadastraal bericht object*: this document contains a general overview of the address and lists the owner and any leasehold on the address.
- *Hypothecair bericht object*: this document contains any mortgages that have been registered for the address.

For both samples we investigated ownership and mortgage arrangement. The results are listed in Table 5.2. The majority of institutions appear to own the location at which they are registered. In some cases, ownership is however, not directly held by the institution itself, but by an umbrella organisation.

Table 5.2: Number of institutions in the two samples with ownership, mortgages and foreign mortgage owners

	Owned by institution	Mortgage	Foreign owner of mortgage
Random sample	15	4	0
Purposive sample	13	6	2

Source: Kadaster (2014)

In both samples, the majority of institutions do not have mortgages, and this share is lower for the random than for the purposive sample. Only within the purposive sample did two institutions list a mortgage owned by a person or entity located outside of the Netherlands. In both these cases, the mortgage owner resided in one of the source countries identified in this study.

A full study of Kadaster information could expand the data available in two ways: breadth and depth. First, the breadth of the data could be expanded by examining the ownership and mortgage arrangements of all known Islamic institutions or even to all religious institutions in the Netherlands rather than just a sample. This information is publicly available. Second, the depth of the data could be expanded by including historical changes in ownership and mortgage arrangements at an address. This information is also publicly available, yet would require more elaborate action from the Kadaster.

Still, information for all religious institutions is publicly available and could be retrieved in a full study. The information would provide an overview of all the ownership and mortgage arrangements of religious institutions and would specify quite precisely how many mortgages are owned by persons or entities not registered in the Netherlands.

Thus, with complete information, an assessment could be made of the extent to which foreign persons or entities are involved in the direct financing of the buildings of the religious institutions in the Netherlands. However, while this would clarify the share of involvement of foreign entities in the financing of the location of religious institutions, it does not inform us about either the amount or any

conditions under which the financing was provided (see also Chapter 6). The information therefore only relates to the funding source, not the funding size.

5.2. Financial status (solvency)

Information about the assets, income and expenditure of individual institutions will provide insight into their financial status or solvency. As explained in Chapter 2, the requirements for financial transparency of associations and foundations are fairly loose. As this section will explain, there are no reporting requirements with regard to foreign donations for tax purposes and few annual reports are available.

5.2.1. Information from the Tax Authorities

For taxation purposes, and as a means to receive various tax exemptions, foundations, voluntary associations and charities can register and subsequently be designated as PBO (in Dutch: ANBI, see Chapter X). Tax exemptions, however, are only provided to those filing taxes in the Netherlands, and as such have little to no applicability for foreign gifts and donations.

The study team found a total of 167 mosques in the ANBI register. Interviewees, however, noted that counting mosques which are ANBIs is difficult since the names used by the organisation do often not include the term mosque or may not directly identify them as such.[17] With respect to the two samples, 8 institutions in the purposive sample and 12 institutions in the random sample have an ANBI status.

5.2.2. Annual Reports

Annual reports typically provide information on financial performance of an organisation as well as details on the organisation's activities. The financial statement as included in an annual report typically consists of a balance sheet providing details on assets, liabilities and equity, an income statement (or: profit and loss account), and a cash flow statement. The financial statements in particular might provide information on foreign financing sources, for example through indicating composition of the organisation's turnover and where the money stems from.

Annual reports of sample institutions

As described in the methods' section of this report, this research looked at whether the 39 sampled institutions publish annual reports on their websites and/or other webpages. It was found that only one of the institutions in our sample published annual reports online: a mosque from the purposive sample located in a large city. Elements of these annual reports of the mosque include a balance sheet, income statement and a cash flow statement. More specifically, it mainly describes the mosque's expenses, including overhead costs, salaries and external expenses such as catering and Zakat, as well as the mosque's turnover, which comes from donations and deposits. However, the annual reports neither specify where these donations come from nor the activities funded by the donations. The reports do refer to loans as

[17] Interview with two senior representatives of Tax Authorities, 8 August 2014.

received from two individuals, and include the names of these individuals as well as the amounts owed to them.

Annual reports of umbrella organisations

Out of the 21 umbrella organisations, four organisations had publicly available annual reports; two mentioned annual reports or had links to annual reports yet these could not be accessed as webpages were under construction, for example; and for the remaining organisations no annual reports were identified. In general, umbrella organisations that have publicly available annual reports tend to be international and/or large in size. While two organisations report mainly on activities, cultural events, ceremonies and conferences, the other two organisations report on its financial status, including details on assets and liabilities. One annual report specifies that the organisations income includes, for example, rent income and funding as received through fundraising and donations. However, specific details on foreign funding or personal details of funding source were not identified. Table 5.3 below describes the main characteristics of the annual reports.

Table 5.3: Key characteristics of identified annual reports from umbrella organisations

Organisation	Assets and liabilities	Income	Expenses	Description of activities
Organisation A	✓	✓	✓	×
Organisation B	✓	✓	✓	×
Organisation C	×	×	×	✓
Organisation D	×	×	×	✓

Based on the findings of this research, it is highly likely that a full study would be able to identify a large number of annual reports for Islamic institutions based in the Netherlands. It is expected that if annual reports are identified at all, they would mainly be provided by larger mosques and/or umbrella organisations. Furthermore, in the ideal case, annual reports include details on the organisation's income and as such, potential information on foreign funding could be identified. However, based on the findings of this research, it is highly likely that only broad categories are included in annual reports, such as 'donations', without a description of more specific details on the exact source of funding.

5.2.3. Additional internet searches

As mentioned in the methods' section of this report, additional internet searches using Google were conducted to ensure all publicly available information on foreign financing of the sample institutions was captured, as well as potential information on conditions. With Google, it is possible to search in different sources such as government open sources, newspaper articles and blogs. Thus, our search could collate a wide variety of new or additional information on foreign funding and conditions in one place. Furthermore, a Google search could indicate how many hits a particular institution has, thereby reflecting, for example, media coverage of a particular Islamic institution that receives foreign funding (or

is said to have received this). The amount of media coverage could flag potential gateways that need further investigation.

The internet search for the 39 sample institutions resulted in mixed results for the random and purposive sample, with information provided through different sources. Sources ranged from AIVD reports to discussions by members of parliament to news articles and forums. In general, more information was identified for the purposive sample, with information on financing and conditions mainly coming from public sector documents, while information for the random sample was limited and mainly provided through (academic) research reports. In total, information about financial transactions was found for eight mosques and information on possible conditions and/or influence was identified for six mosques. In general, information on foreign financing ranged from reported details on the exact amount of funding, to more broad statements about the existence of foreign funding. Information on conditions and/or influence as well as other potentially relevant information will be discussed in Chapter 6. Table 5.4 lists the findings for the sample institutions that had information on foreign financing. It also includes the type of sources in which the identified information is found.

Table 5.4: Information on foreign funding available through internet searches (sample institutions)

Sample	Organisation	Type of source(s)
Purposive sample	Organisation A	Mix of public sector and a blog post
	Organisation B	Mix of public sector and a media report
	Organisation C	Public sector
	Organisation D	Public sector
	Organisation E	Mix of public sector and a media report
	Organisation F	Public sector
Random sample	Organisation G	Research report
	Organisation H	Research report

A full study could expand the list of Islamic institutions and could provide information on foreign funding as obtained from a wide variety of sources. However, it should be noted that since only limited information was identified for the random sampled institutions in this research, it is expected that a full study would not yield many relevant results. As such, an internet search could potentially best be used to verify existing information or leads on foreign funding for selected Islamic institutions.

With complete information an assessment could be made to identify the extent to which foreign funding of Islamic institutions in the Netherlands exists. When assessing the reliability of the information, it should be taken into account that the quality of these online documents varies. Furthermore, it is not always clear on what sources public sector information is based on, for example whether it is based on intelligence or news sources. Similarly, caution is required when assessing the reliability of media reports, blogs and other venues as it could prove to be difficult to determine the original source of information.

5.3. Financial transactions

The third aspect of Islamic institutions that can possibly inform us on the scope and size of foreign financing of Islamic institutions relates to financial transactions. Data on financial transactions is of course the most direct measure of foreign financing of Islamic institutions in the Netherlands, yet as will become clear it is also the least accessible source of data as it is largely not public.

5.3.1. Banking information on account transactions

Since the founding of the Financial Action Task Force by the G7 in Paris in 1989, banks have been on the front line of the global effort to tackle illicit finance, expected by national and international authorities to identify suspicious transactions. This pressure increased exponentially following the 9/11 attacks in light of which the FATF expanded its role from anti-money laundering (AML) targeted at the narcotics trade to include counter-terror finance (CTF). FATF provides 40 Recommendations that countries and their financial systems are required to follow to combat money-laundering and terrorist-financing.[18] Every 4 to 5 years FATF arranges so-called 'mutual evaluations' of member countries to determine the extent to which each country is complying with its Recommendations. Failure to comply is publicised and, *in extremis,* countries that are deemed to fall significantly short of FATF's requirements are 'named-and-shamed' and required to take remedial action.

FATF's Recommendations 20 and 23 require financial institutions and so-called 'designated non-financial financial businesses and professions' to report suspicious financial activity to their local financial intelligence unit (FIU).

> 'If a financial institution suspects or has reasonable grounds to suspect that funds are the proceeds of a criminal activity, or are related to terrorist financing, it should be required, by law, to report promptly its suspicions to the financial intelligence unit (FIU).'
>
> *(FATF 2012, 19)*

Specifically in the Netherlands, on its website, the FIU-Netherlands states,

> 'In accordance with the Dutch Prevention of Money Laundering and the Financing of Terrorism Act (WWFT), specific institutions have a legal duty to report unusual transactions to the Financial Intelligence Unit (FIU-Netherlands)'
>
> *(FIU-NL homepage 2014)*

Currently, the following institutions have an obligation to report unusual transactions to FIU-Netherlands: banks, credit institutions, security institutions, investment institutions, money transaction offices, providers of money transaction offices, life insurers and insurance brokers, credit card companies, casinos, traders in objects of great value, other traders, accountants, lawyers, tax consultants, brokers in real estate, estate agents, civil-law notaries, administrative offices, independent legal consultants, and trust companies.[19]

---

[18] For further details of FATF's Recommendations see: FATF (2012).

[19] See FIU-NL for further details (FIU-NL 2014d).

Designating responsibility for securing a country's financial borders to the financial services industry (both formal and informal, such as money service businesses) is predicated on the fact that the vast majority of funding flowing into and out of a country passes through the financial services industry industry. However, data protection and privacy issues mean that access to this data is generally strictly controlled unless the financial services industry suspects that particular transfers and accounts are connected with money-laundering, terrorist-financing, or counter-proliferation financing.

The most effective way of identifying financial flows from source countries to religious institutions in the Netherlands would be to require the holders of bank accounts to report relevant transactions. However, whilst the financial services industry may hold information that helps identify sources and destinations of foreign funding, there is no requirement to report them to the FIU unless these flows are deemed to be 'unusual'.

FIU-Netherlands provides some broad guidance of what it classifies as unusual transaction activity on its website. As it relates to credit institutions, securities institutions, investment companies and money transfer offices, FIU-Netherlands identifies the following: [20]

Objective indicators

- Transactions with (legal) persons who are established in countries or territories which have been designated by the Minister of Justice and the Minister of Finance as an unacceptable risk for money laundering or terrorist financing.
- Transactions which are reported to the police or the judicial authorities in connection with money laundering must also be reported to the Reporting Centre (FIU).
- Cash transactions of 15,000 Euros or more in value, whereby cash is exchanged for another currency or exchanged from bank notes of small denomination to bank notes of large denominations.

Subjective indicator

- Transactions where there is reason to believe that they may be connected to money laundering or terrorist financing.

A review of FIU-Netherlands' 'list of indicators' provides no obvious rationale for the financial services industry to report the funding flows that this project is seeking to identify, and to the extent transactions are reported they will certainly not be available to the public through open sources. Indeed there is a specific provision in FATF's Recommendations (Recommendation 21) that requires that 'financial institutions, their directors, officers and employees should be…prohibited by law from disclosing ('tipping-off') the fact that a suspicious transaction report (STR) or related information is being filed with the FIU.' (FATF 2012).

In many countries, following the global financial crisis, the relationship between the banking sector and public sector authorities remains at best tense and at worst uncooperative. Whilst it is our understanding that there is a good level of partnership between banks and authorities in the Netherlands, the possible

[20] See FIU-Netherlands website for full details of indicators (FIU-NL 2014c).

level of information sharing remains governed by privacy laws and the legal requirements of the financial services industry under the Dutch legislation for *Witwassen en Financieren van Terrorisme* (WWFT).

It should be noted that the research team has approached *De Nederlandsche Bank* (DNB) for assistance with this project. The contacted representative of the department that supervises financial service providers such as money transfer offices felt that DNB held little relevance to the objectives of this study, unless in exceptional cases when money is being transferred to charities. We have not received any additional information.

5.3.2. Customs information on cash transactions

Foreign funding of religious institutions can occur along various routes, one of which might be as cash brought in through air or other travel. To understand the public information that is available on cash transports, the Dutch Customs office (*Douane*) was approached. On the basis of an interview conducted with Customs and information subsequently received from Customs, two observations with regards to cash can be made (Vicedomini 2014). First, the majority of cash is brought into the country through cargo and not passenger travel. A conservative estimate by Customs for 2013 estimate the total amount of cash transported by cargo at 3.7 billion Euros, whereas traveller declarations only amount to 129 million Euros. Second, apart from the amount, any additional information available is only for passenger travel, as there are no legal control systems yet for the transport of cash in cargo, via couriers or through the mail.

Data was received from Customs on traveller declarations of cash at Dutch airports. Cash declarations are required at airports for amounts over 10,000 Euros.[21] Table 5.5 specifies the amount of declarations from air travel from any of the source countries (from any nationality), or from nationals from the source countries (from any destination). In addition, we show the total amounts of reported sums (average and cumulative) these travellers have brought directly into the Netherlands via air travel.

[21] See EU 'Cash control Regulation': Regulation No 1889/2005. As of 13 February 2015 http://ec.europa.eu/taxation_customs/customs/customs_controls/cash_controls/index_en.htm

Table 5.5: Custom self-declarations at airports: total cash amounts brought into the Netherlands by natural persons coming from third countries

Source country as country of origin	Number of travellers	Average per traveller	Total
United Arab Emirates	67	€27,045	€1,703,849
Kuwait	16	€45,594	€729,510
Morocco	4	€20,116	€80,467
Qatar	10	€52,988	€529,889
Saudi Arabia	7	€24,416	€146,501
Turkey	110	€33,164	€3,581,746
Nationals from source countries	**Number of travellers**	**Average per traveller**	**Total**
United Arab Emirates	30	€21,781	€87,125
Kuwait	14	€46,866	€515,536
Morocco	1	€19,075	€76,302
Qatar	5	€24,035	€72,106
Saudi Arabia	5	€24,619	€147,719
Turkey	58	€24,702	€1,556,256

Source: email correspondence customs representative (2014)

When cash is declared at airports a cash declaration form has to be completed which asks for the amount, the origin and the purpose for the cash. On the basis of the information provided, Customs occasionally start inquiries if there is a suspicion of money laundering. In the vast majority of cases however, the origin and purpose stated are not verified, nor can they easily be verified. The truth value of the declarations is thereby hard to establish. It is nevertheless unlikely that controversial origins and purposes of cash would be declared. A scan through the declarations for the subsamples of the table above shows that the origin mentioned is often a bank or 'my company', whereas a commonly mentioned purpose is to buy cars, trucks or building materials.

With regard to the possible funding of religious institutions therefore, it is difficult to derive any reliable information from the customs data. If foreign financing did occur through air travel, it would be hard to identify. Moreover, because of the internal market's free movement principle, amounts carried from other EU Member States are not monitored.

5.3.3. Information from diplomatic sources: embassies and the Ministry of Foreign Affairs

The Dutch Ministry of Foreign Affairs (MoFA) may have access to information that concerns the funding provided by source countries to institutions in the Netherlands. During one of our interviews with a key informant, it was suggested that the MoFA has an understanding with diplomatic corps of certain source countries that the MoFA would be notified in case funding from that country were to be provided to Islamic institutions A MoFA representative confirmed that certain countries indeed do provide information related to their funding activities. However, it is worth noting that based on our conversation

with the MoFA representative, this practice does not appear to be widespread or common to all countries whose diplomatic corps are present in the Netherlands. The MoFA representative did acknowledge that 'one or two' source countries from this study have provided the MoFA with information related to their funding activities in the Netherlands, but this information is not public.

Based on confidential information we were given access to, such data also appear to be limited. Although it contains names of institutions to which the funding has been provided and the dates when it was provided, amounts are not necessarily, or as a rule, included. In instances where there might be an agreement between the MoFA and one or more embassies of potential source countries, it would be possible to track foreign funding from these countries. Not only would this transparency help target intelligence agencies' efforts to monitor only those institutions where funding is actually reported, it would also improve trust between source country government and Dutch authorities and provide some assurance that the funding provided is used for the intended purpose. Such reporting would however always be dependent on the willingness of source countries to be transparent about their international funding activities. Equally, the sustainability of these arrangements would also depend on the willingness of the Dutch authorities not to violate this trust.

According to our sources, the MoFA agreed with diplomats from individual source countries that it is compliant with national legislation. In return, we were told, the MoFA requested that it would be informed about any recent or prospective financial transactions by the source country embassy in the Netherlands. These 'requests' would be reported to the national intelligence agency (AIVD), which in turn would investigate any potential threats to national security or the democratic rule of law.

5.4. Proxies for (sources of) funding

Some sources of information may not provide direct information about the size of foreign funding, but rather provide an indication of the existence or the origin of such funding. In this section, we discuss some of these sources.

5.4.1. Construction permits

Information in construction permit applications can provide background information about institutions that required such a permit for any construction or reconstruction. As construction permits fall under local responsibility, the information requested in such applications may differ between municipalities. As part of this feasibility study, we only requested access to permit applications in the two cities with the highest number of institutions, five and four respectively. Hence, our observations are limited to those two cities.

In City A, we were asked to visit the municipal archives and were allowed access to all records for those addresses. These records included all completed permit applications forms, correspondence between the applicant and the municipality, technical reports, technical drawings, visit reports, etc. However, the municipal administrators were unable to fulfil this request for integrated physical environment permits (since 2010).

For City B, our researchers were sent copies of the permit application forms only. Table 5.6 summarises the information attributes available for the sample institutions in these two cities.

Table 5.6: List of information attributes available in construction permits (until 2010) relevant for this study

Information attributes	City A	City B
1. Contact details of applicant	✓	✓
2. Role of applicant (owner or user; construction company; tenant; etc.)	✓	✓
3. Contact details of delegated representative	✓	✓
4. Role of delegated representative (architect; construction company; building manager/consultant; other)	✓	
5. Size of the (additional) space to be constructed (m2)	✓	✓
6. Construction costs (Euros excluding VAT)	✓	✓
7. Contact details of recipient for the invoice of construction permit costs ('bouwleges')	✓	
8. Contact details of architect (if different from 3)	✓	
9. Contact details of technical engineer responsible for structural analysis/calculations (if different from X)	✓	
10. Purpose/destination of the new/additional construction (e.g. mosque)	✓	✓
11. Designated use(s) of new/additional space (in m2) (gathering, healthcare, industry, office, accommodation, education, sports, retail, etc.)	✓*	✓
12. Signed by delegated signatory	✓	

NOTE:* Designated uses of space(s) are indicated in the technical drawings, which is available in the archives of City A.

We identified three files in the municipal archives for City A for the period 2000-2010, two of which referred to reconstruction projects and one involved the new construction of a mosque. Two of the institutions in the samples (one in the purposive sample and one in the random sample) did not file any construction permit requests in the period under analysis. There were older files related to these premises, but they predated the presence of the Islamic institutions in the buildings.

The three files provide contact information of the person responsible for the permit administration. This does not necessarily have to be a legal representative. It can be a staff member of the architect or construction company. In most cases, contact names seem to be local representatives, rather than those related to source of financing.

The first estimate of the construction costs (for the initial calculation of the permit costs ('*leges*')) provides information about the estimated funding needs. Whilst this estimate may not comprise all costs associated

with the (re-)construction, they will provide a first proxy. For the ultimate calculation of the permit costs, the applicant will have to provide invoices as evidence. These invoices, which are included in the archive files, bear the name of the invoice addressee, responsible for paying the construction costs. In the case of one of the institutions in the purposive sample, these invoices were addressed to an individual based in the Gulf region, representing a foundation affiliated with the national government.

The correspondence between municipal administers and the institutions' representatives, which is available in the archive files, offers some insights into the adequacy of project management and soundness of financial management. Although the correspondence can flag incidents and issues that may be relevant in the context of this study (e.g. exceeding initial construction budget estimates), it is inapt for systematic analysis and hence for a comprehensive assessment of foreign funding or potential influence. Other than the very generic classification of 'mosque' or 'education institution', there is limited information in the files about the types of activities to be employed in the new or renewed structures.

However, for specific institutions the archive files may help in constructing, completing or validating a narrative about the actors involved in the construction process, their responsibilities, performance, relations and the potential difficulties they may be facing. In the case of the construction of a mosque involving funding from the Gulf region mentioned above, it was possible to validate various elements of reports in the popular media.

Table 5.7: Description of the sample of construction permit applications reviewed in two cities

		New construction	Amendment	No construction permits (available)
City 1 (2000-2010)	Purposive sample (n=4)	1	2	1
	Random sample (n=1)			1
City 2 (2000-2014)	Purposive sample (n=4)	2	2	
	Random sample (n=0)			

5.4.2. Police and prosecutor records

A recently released RMO publication explained that funding [to religious institutions] is legitimate as long as such financing does not lead to violence, criminal activities, undermining of the rule of law, the spread of 'non-democratic' values or 'destabilising' activities (RMO 2014). External financing of association – whether religious or not – and foundations is common in the Netherlands and elsewhere and inevitable in the absence of the absence of public sector funding (RMO 2014). Therefore, some religious institutions may turn abroad in their search for donations to fund expansion, construction or ongoing activities. Prosecutor files and police records may not provide direct information about

transactions from sources abroad. However, these files may contain information about the institutions in our sample. If there is evidence or a suspicion of fraud, money laundering or other white collar crimes involving international funders or intermediaries, they may provide a proxy or an indication of potential foreign financing to these sample institutions.

We filed a request to the prosecutor service to access files from the national police (records, complaints filed, arrests, etc.) in relation to the institutions in our two samples that might hint at any potential financial crimes as mentioned above. We specified a set of offences to be used as search or filter terms in combination with the names of the 39 sample institutions (see Table 5.8).

The resulting file numbers would then be used as queries in the public prosecutor database. This would allow us to follow through and analyse records of the (suspected) crimes, offences or wrongful acts that are of interest in which any of the sample institutions are mentioned.

Table 5.8: Types of offences specified with potential relevance for the size and scope of foreign funding

Offence	Legal term in Dutch	Legal source
Tax evasion	Belastingontduiking	Algemene Wet inzake Rijksbelastingen Art.69
Bribery	Omkoping	WSr Art. 177, Art 177a
Transnational corruption and bribery	Grensoverschrijdende corruptie en omkoping van buitenlandse overheidsfunctionarissen	Foreign corrupt practices act (FCPA); United Kingdom Bribery Act (directly apply to The Netherlands)
Fraud	Fraude; Valsheid in geschriften, opgave van onware gegevens en schending van de verplichting gegevens te verstrekken	WSr holds no clear definition, but an entire chapter ("Titel XII") relates to this, as well as Art. 328
Money laundering	Witwassen	WSr Art. 420bis, Art. 420quater

Note: WSr = criminal code

As mentioned above, due to the absence of available police file numbers, we were unable to conduct queries in the public prosecutor database. Hence, it is also impossible to assess what could potentially be retrieved about religious institutions if we would expand the search beyond those included in the two samples to all institutions known to us.

5.4.3. Court cases

Another potential proxy or indirect way to find evidence of possible foreign financial transactions to Islamic institutions in the Netherlands is through court cases. Records of court cases report on criminal or civil law violations and as such, they may provide details on illegal transactions or financial wrongdoings committed under potential influence of (foreign) funders. Furthermore, it could also provide background information of the relevant mosque in cases not directly related to illegal transactions or financial wrongdoing, thereby potentially including organisational structure and financial details. As such, court

cases could be a useful source for retrieving detailed information on foreign funding – and potential conditions as set by the funders – of Islamic institutions in the Netherlands.

As mentioned in the methods' section of this report, this feasibility study looked at whether the sample institutions as well as the umbrella organisations were involved in court cases. The following sections describe the main findings of this search related to foreign funding. Chapter 6 reports on information as found in court cases regarding possible conditions and/or influence and other potentially relevant information.

Sample institutions involved in court cases

Out of the list of 39 sample institutions, eleven institutions were involved in or mentioned in court case reports, eight institutions from the purposive sample and three from the random sample. It mainly involved court case reports in the field of civil law, administrative law, immigration law and environmental law.

Following the search of institutions in the courts' database ("*rechtspraak.nl")*, two cross-cutting themes among all cases were identified. Firstly, different hearings, and thus different court reports, can refer to the same case when courts have been involved at different stages (i.e. local court and appeal cases). Secondly, institutions were not always a party in the case (i.e. plaintiff or defendant), yet were only mentioned in the court report. As such, caution is required when drawing quantitative conclusions solely based on how often an institution appears in court case reports.

While the identified court cases in which three institutions from the random sample were involved did not disclose issues related to foreign funding, conditions or other potentially relevant information, there were more details available for institutions from the purposive sample. There was one case in which foreign funding of the relevant institutions was mentioned, including details on influence such as the appointment of foreign board members. It should be emphasised that this case *mentioned* foreign funding, yet not involved a financial crime or wrongdoing as such.

Table 5.9 describes in how many cases the institutions were mentioned and/or involved as parties and whether the cases provide information on foreign financing.

Table 5.9: Information on foreign financing available in identified court cases (sample institutions)

Sample	Organisation	Mentioned in court cases (number of cases)	Information on foreign financing
Purposive sample		Total: 31	
	Organisation A	11[a]	✗
	Organisation B	3[b]	✗
	Organisation C	7[c]	✗
	Organisation D	5[d]	✓
	Organisation E	1[e]	✗
	Organisation F	1	✗
	Organisation G	2[f]	✗
	Organisation H	1	✗
Random sample		**Total: 3**	
	Organisation I	1	✗
	Organisation J	1	✗
	Organisation K	1	✗

[a] Out of eleven court cases, in ten of these cases, the institution was not one of the parties. These cases did mention the institution and/or regarded issues related the institution. Furthermore, two court cases refer to the same case.
[b] Of which two court reports refer to the same case.
[c] All court cases are most likely linked to each other.
[d] Of which two court reports refer to the same case.
[e] The institution was not one of the parties.
[f] The institution was not one of the parties both cases. The case report did mention the institution and/or regarded issues related the institution.

Umbrella organisations involved in court cases

Out of 21 umbrella organisations, eight organisations were involved in or mentioned in court cases. They were mainly involved in or mentioned in court cases in the field of administrative, civil and environmental law. One case was dealt with under criminal law. Similar to the findings from the sample institutions, different court reports could refer to the same case and organisations were not always a party in the case (i.e. plaintiff or defendant), yet were only mentioned in the court case.

Contrary to the purposive sample of Islamic institutions, none of the cases in which the umbrella organisations were mentioned, related to foreign funding. Other potentially relevant cases are discussed in Section 6.2.2.

5.5. In sum

While the data allowed verification of individual cases of funding to specific Islamic institutions in the sample published in the literature or the media, the data do not allow for a general estimate of the size of foreign funding. Such individual verifications are unlikely to be an effective way to identify or scope the broader environment. The most crucial type of information – that of financial transactions – is not publicly available.

Another reason for the difficulty of deriving solid conclusions from the available evidence is the rather diverse data quality. Whilst information in the public records tends to be reliable, data for sample institutions are not always complete. Moreover, there is little transparency of the financial status, income or expenditure of Islamic institutions. For instance, of the 39 institutions in the two samples, we only identified one annual report, which did not provide information about donations.

In general, caution is required when trying to extrapolate the findings beyond the two samples. Analysis of court cases and board membership suggest that those institutions that, for instance, regularly feature in the news are not representative for the entire population of Islamic institutions in the Netherlands.

6. The feasibility of assessing foreign funding conditions for Islamic institutions in the Netherlands

The research questions require us not only to collect and analyse data on the potential size and scope of foreign funding, but also urge us to verify whether there is any indication of foreign influence on mosques in the Netherlands, for example through conditions attached to funding. While such influence need not be problematic, the concern has been voiced that donors may spread ideas and encourage actions which conflict with democratic values through foreign financing. A number of public data sources can again be investigated to understand if and how they can provide insights into foreign influence and conditional funding.

The data that can be used to assess any foreign influence and conditional funding can be conceptually divided into two types. First, we will analyse data available on the characteristics of the mosques in the random and purposive sample. Second, we will use the mosques from the samples and the umbrella organisation to check if they appear in court cases, and if so, if those cases could provide any information of foreign influence and conditional funding. Both types of data are therefore based on outcomes or actions that resulted after funding may have taken place and are therefore, at best, proxies of conditional funding.

Table 6.1: Overview of information sources for assessment of feasibility of investigating funding conditions

Aspect	Indicators	Data
Mosque characteristics	Ownership and mortgage arrangements	Land Registry (Kadaster)
	Board membership	Chamber of Commerce
Mosque activities and actions	(suspected) crimes, offences or wrongful acts	Police and prosecutor records (*not available*) Court cases

6.1. Mosque characteristics

6.1.1. Land registry data

The information obtained through the Kadaster provides information on the ownership and mortgage arrangements of the addresses at which religious institutions are registered. As such, it can provide information on the extent to which foreign persons or entities are involved with the financing of the buildings of religious institutions. However, as no information is available about the nature or content of these arrangements, the information from the Kadaster, in isolation, cannot provide any information about possible conditions related to funding.

6.1.2. Chamber of Commerce

Governance is of interest in this study for two reasons. First, the composition of governing boards of religious institutions may indicate the influence particular parties aim to have over the organisation. If, for example, all board members are from a particular country outside of the Netherlands, this may suggest (but does not mean) a certain degree of foreign influence over the institution. Second, changes in the composition of governance boards over time may suggest changes in the influence of certain parties over the institution.

Data from the Chamber of Commerce (*Kamer van Koophandel,* KvK) was requested as they may provide insights into the governance of religious institutions through the information on board membership. The KvK is an independent organisation that falls under the authority of the Ministry of Economic Affairs. By law, the KvK maintains the Dutch list of company registers (*Handelsregister*) that includes all registered companies, charities, foundations and other private legal entities, such as religious institutions (KvK 2014). Through the KvK, public information can therefore be obtained on the board composition of religious institutions. This information can in turn give us an understanding of the extent to which foreign nationals are involved with the governance of Dutch religious institutions.

However, several limitations should be noted in relation to the data available from the KvK. First, rather than a direct measure of influence, the data from the KvK can serve as a proxy of (changes in) influence. As very little is known about the boards, that is, how they operate and what kind of influence they (could) exert, the data should be interpreted with great care. In fact, rather than the actual numbers, changes in the number may be of greater interest as they might indicate increasing or decreasing possible influence of certain parties through board membership.

The KvK was able to provide us with publicly available information for 19 institutions from the random sample and 17 institutions from the purposive sample. In certain cases no KvK-number could be found for the institutions identified, in which case no data could be retrieved by the KvK. The data received from the KvK contained the following information:

- Names and function of board members – past and present
- Start date and end date of board membership per member – past and present
- Country of birth and current country of residence – past and present

The data contains information on a total of 1266 board members, from the 1960s until today. Of the 1266 we found there to be 989 unique individuals. This is not surprising as the same individuals may serve on boards multiple times and in various functions. The purposive sample contains 516 board members, of which 416 are unique individuals, and the random sample 750 board members, of which 573 are unique individuals. The data allow an overview of the changes in board membership over time broken down by the nationality of the board members. As is clear, the vast majority of board members were born and are residents of the Netherlands. Non-Dutch board members (both country of birth and country of residence outside the Netherlands) represent a small fraction in the purposive sample (5.8 per cent) and an even smaller fraction in the random sample (0.9 per cent). Non-Dutch board members are people

Table 6.2: Board positions started and ended in KvK register for both samples

	Total (unique individuals)	up to 1995 total	1996-2005 total	2006-today total	Total active today
		Started/Ended	Started/Ended	Started/Ended	
			Total sample		
Random	750 (573)	286/179	233/208	239/232	131
Purposive	516 (416)	202/153	174/137	132/146	80
			Total Non-NL		
Random	7 (out of 750)	4/2	0/2	3/1	2
Purposive	30 (out of 516)	17/0	6/7	7/9	14

NOTE: the number refer to new board positions taken up or ended, rather than unique individuals

In addition, the data show that the 16 Non-Dutch board members currently in place are distributed over 8 institutions, one in the random sample and seven in the purposive sample. The 37 Non-Dutch board members that have ever been on boards have been distributed over 14 institutions, 4 from the random sample and 10 from the purposive sample. Of these 37 boards members 29 are unique individuals. Again, it should be noted that board members of foreign nationality do not necessarily signify any influence by foreign state actors. However, where the nationality of one or more of the board members corresponds to the existence of foreign funding to a specific institution, the appointment of this board member could indicate potential funder influence on the institution's daily management. The countries of birth of the non-Dutch board members are listed in Table 6.3.

Table 6.3: Number of board members with foreign nationality per sample

Purposive sample	
Belgium	4
Norway	1
Ireland	2
Austria	1
Turkey	8
Morocco	1
Saudi Arabia	7
United Arab Emirates	2
Indonesia	1
Stateless	3
Random sample	
Turkey	5
Stateless	2

A comprehensive study could expand the data available from the KvK to include all known Islamic institutions, or even religious institutions in general. That would provide an insight into the total number of non-Dutch board members at Dutch religious institutions. This number could serve as a first, but limited, indirect proxy of engagement of foreign nationals with the governance of Islamic institutions vis-à-vis other institutions of other religions. However, changes in board membership could suggest financial transfers of funds in cases where, for example, foreign nationals are added to boards; yet, this is quite speculative. Even if such instances could be established, it still would not provide us with insights into the nature of these governance arrangements. Thus, the data would not inform us on any conditions that may have been attached to funding.

6.2. Mosque-related actions and activities

6.2.1. Police records and prosecutor files

One of the concerns among parliamentarians that led to the commissioning of this study is the potential influence foreign state actors may exert on the local community by offering funding under certain conditions. Discussions in parliament suggest that there is particular concern about potential influence of funding on 'undesired processes' that might affect the core values of the Dutch democracy under the rule of law (Opstelten 2013). In the political debate, these undesired processes primarily appear to refer to terrorism and radicalisation, but may also involve human rights violations, such as those involving women's or LGBT rights. Notwithstanding the many caveats associated with this analysis, prosecutor files and police records may hold information on such (suspected) crimes, offences or wrongful acts in relation to any of these institutions.

We specified a set of offences to be used as search or filter terms in combination with the names of the 39 sample institutions (see Table 6.4). As explained in Section 5.4.2, we were not granted access to police data. The absence of available police file numbers means that we were unable to conduct queries in the

public prosecutor database. Hence, it is also impossible to assess what could potentially be retrieved about religious institutions if we would expand the search beyond those included in the two samples to all institutions known to us.

Table 6.4: Offences potentially related to 'undesired processes' that might affect the core values of Dutch democracy.

Offence	Legal term in Dutch	Offence
Crimes against personal freedom:	Misdrijven tegen de persoonlijke vrijheid:	
Human trafficking;	Mensenhandel;	WSr Art.273f; Art. 278
Depriving X of freedom	Iemand wederrechtelijk van zijn vrijheid beroven; met terroristisch oogmerk;	WSr Art. 282; Art. 282b
(Planning) terrorist acts	Het voorbereiden, samenspannen voor en/of uitvoeren van terroristische misdrijven	WSr Art. 4, which has been amended based on the 2004 Wet Terroristische Maatregelen
Inciting hatred; inciting discrimination; disseminating materials that incite hate or discrimination	Opruiing en haatzaaien, aanzetten tot haat; aanzetten tot discriminatie; Verspreiden van voorwerpen met dit doel	WSr Art. 137d; WSr Art. 137e sub1.1; WSr Art. 137e sub1.2
Partaking in, and financially or otherwise materially supporting of the incitement of hatred or discrimination	Deelnemen of geldelijke of andere stoffelijke steun verlenen aan activiteiten gericht op discriminatie	WSr Art. 137f
Discrimination	Discriminatie	Several articles: WSr 429quater and Art. 135c-137g (definition of discrimination provided in Art. 90quater)
(Sectarian) violence, for example public violence on persons or goods	(sektarisch) geweld, bijv. openlijke geweldpleging op personen en/of goederen	Wsr Art. 141
Undermining democracy	Ondermijning van de democratie	Wsr Art. 92, 93, 103-105 and 106
Violation of/infringement on national security	Inbreuk op de staatsveiligheid	An entire chapter (Titel I: Misdrijven tegen de veiligheid van de staat), WSr Art. 92-107a.
Forced marriage	Huwelijksdwang	WSr Art. 284
Marriage without prior civil marriage	Huwelijk zonder voorafgaand burgerlijk huwelijk	Burgerlijk Wetboek Boek 1, Art. 68 and WSr Art. 449

Even without having conducted this review, it should be noted that the results of the analysis – if it was to be carried out – should be interpreted with considerable caution. If any of these institutions are mentioned in police records or prosecutor files, it is difficult if not impossible to determine whether there is a link between the institution itself and the behaviour of its staff or individual members of its community. The recent RMO advice (RMO 2014) refers to this issue as 'chain accountability'

(*'ketenaansprakelijkheid'*): only under certain specific circumstances it is possible to hold the financier accountable via criminal or civil law. This may only be the case for very severe crimes, where the external driving force is clear. The potential success of such a court case depends on a precise determination of the facts. For less severe crimes of offences, even if there is a direct causal relation between any foreign funding and criminal behaviour, it is unlikely that the police records or prosecutor files will provide the evidence for this link.

6.2.2. Court cases

In Chapter 5 we reported on the analysis of court cases that mentioned foreign funding. However, records of court cases reporting on criminal or civil law violations may also provide information on (suspected) illegal acts committed under potential influence of (foreign) funders and potential conditions as set by these funders of Islamic institutions. Offenses potentially committed under the influence of foreign funders might come up when searching court cases' databases.

As such, court cases could be a useful source for retrieving detailed information on the potential influence of foreign funders on Islamic institutions in the Netherlands. As explained in Chapter 5, we searched the "*rechtspraak.nl*" database to review whether the institutions included in our two samples as well as the umbrella organisations were involved in court cases. The following sections describe the findings for the cases potentially related to the *influence* of foreign funding as well as other potentially relevant information that might be linked to foreign funding streams, yet that is not identified as such in the court case.

Sample institutions involved in court cases

As mentioned in Chapter 5, eleven out of 39 institutions were involved in or mentioned in court cases, mainly involving court cases in the field of civil law, administrative law, immigration law and environmental law.[22]

The court cases did not disclose any information relevant for this study for the three institutions in the random sample. As mentioned in Section 5.4.3, there was one notable case in which foreign funding of the relevant institution was mentioned, including details on influence such as the appointment of foreign board members. Other potentially relevant information related to (the withdrawal of) resident permits of imams, for example following AIVD information; a conflict between a mosque and its imam who sealed Islamic marriages while there was no legally required civil marriage in place; a conflict between a mosque and some of its members in which members stated that the board of the mosque lacked transparency about its finances and use of donations; and a case relating to accused financial wrongdoings by board members. Other, non-relevant cases included, for example, issues around building permits and the development of some of the mosques more generally, such as a local interest group that objected to the issuing of a building permit, stating that the development of a mosque was against the local zoning plan.

Table 6.5 shows the number of cases in which the sample institutions were mentioned and/or involved as parties and the type of information available in these cases.

---

[22] The limitations of this analysis as well as the caution needed to interpret the results are explained in Section 5.4.3.

Table 6.5: Information on possible conditions and/or influence and other potentially relevant information available in identified court cases (sample institutions)

Sample	Organisation	Mentioned in court cases (number of cases)	Information on possible conditions and/or influence	Other potentially relevant information
Purposive sample		Total: 31		
	Organisation A	11[a]	✓	✓
	Organisation B	3b	×	✓
	Organisation C	7c	×	✓
	Organisation D	5d	✓	✓
	Organisation E	1e	×	✓
	Organisation F	1	×	✓
	Organisation G	2f	×	×
	Organisation H	1	×	✓
Random sample		Total: 3		
	Organisation I	1	×	×
	Organisation J	1	×	×
	Organisation K	1	×	×

[a] Out of eleven court cases, in ten of these cases, the institution was not one of the parties. These cases did mention the institution and/or regarded issues related the institution. Furthermore, two court cases refer to the same case.
[b] Of which two court cases refer to the same case.
[c] All court cases are most likely linked to each other.
[d] Of which two court cases refer to the same case.
[e] The institution was not one of the parties.
[f] The institution was not one of the parties both cases. The case did mention the institution and/or regarded issues related the institution.

Umbrella organisations involved in court cases

Out of 21 umbrella organisations, eight organisations were involved in or mentioned in court cases. Cases included, but were not limited to, issues around broadcasting rights, building permits and expropriation.

Table 6.6 shows the number of cases in which the umbrella organisations were mentioned and/or involved as parties and the type of information available in these cases. There was no information found with regard to possible conditions and/or influence. Similar to the table on the sample institutions, the 'other potentially relevant information' category refers to information that might be linked to foreign funding streams, yet is not identified as such in the court case. This includes, for example, an issue around unlicensed practice of funeral services.

Table 6.6: Information on possible conditions and/or influence and other potentially relevant information available in identified court cases (umbrella organisations)

Organisation	Mentioned in court cases (number of cases)	Information on possible conditions and/or influence	Other potentially relevant information
Organisation A	5a	×	×
Organisation B	8b	×	✓
Organisation C	1	×	×
Organisation D	2c	×	×
Organisation E	2d	×	×
Organisation F	1	×	×
Organisation G	2e	×	✓
Organisation H	4f	×	×
Total	**25**		

[a] Out of the five court cases, in three of the cases, the organisation was not one of the parties. Furthermore, all court cases are most likely linked to each other.
[b] Out of the eight court cases, in two of the cases, the organisation was not one of the parties.
[c] These two cases are linked to each other. In one of the cases, the organisation was dismissed as a party in the case.
[d] Of which two court cases refer to the same case.
[e] In one of the cases, the organisation was not one of the parties.
[f] Of which two court cases refer to the same case.

Since this research mainly found information on court cases for the purposive sample, it is not very likely that expanding this search for all Islamic institutions in the Netherlands would increase the results substantially. Moreover, as this research did not identify many cases related to foreign funding and/or conditions as set by funders, it is unlikely to yield relevant results in the full study.

As mentioned before, caution is required when drawing quantitative conclusions solely based on how often an institution appears in court cases. However, despite the fact that limited evidence on foreign funding was found in this study, court cases may provide leads for follow-up, for example when relating to withdrawal of residence permits of imams. It could also be used as a verification tool when foreign funding is identified through other sources.

6.2.3. Additional internet searches

Chapter 5 reported on the additional internet searches that were conducted in order to ensure that all publicly available information on foreign financing of the sample institutions, potential information on conditions as well as other potentially relevant information is captured. While Chapter 5 discussed the findings in relation to foreign funding, this section includes information on possible conditions and/or influence as well as other potentially relevant information. Overall, mainly public sector sources and media sources reported on possible conditions and/or influence or other potentially relevant information for five institutions from the purposive sample and one from the random sample. In one case there were

several contrary messages regarding the existence (and non-existence) of foreign influences. Information on conditions and/or influence ranged from more general statements to specific details on appointments of foreign board members or imams. Other potentially relevant information included controversial preaches by imams in some of the mosques.

Table 6.7 lists the sample institutions for which information on possible conditions and/or influence and other potentially relevant information was identified. It also includes the type of sources in which the identified information was found.

Table 6.7: Information on possible conditions and/or influence and other potentially relevant information available through internet searches (sample institutions)

Organisation	Information on possible conditions and/or influence	Other potentially relevant information	Type of source(s)
Purposive sample			
Organisation A	✓	✓	Mix of public sector and media reports
Organisation B	Contrary messages	×	Mix of public sector and media reports
Organisation C	✓	✓	Mix of public sector and media report
Organisation D	✓	✓	Mix of public sector and a media report
Organisation F	✓	×	Mix of public sector and a media report
Organisation G	×	✓	Media reports
Organisation H	×	✓	Blog/website
Organisation I	×	✓	Media report
Organisation J	×	✓	Forum
Organisation K	×	✓	Website
Random sample			
Organisation L	×	✓	Media report
Organisation M	✓	✓	Mix of research report and public sector
Organisation N	×	✓	Mix of media report and YouTube
Organisation O	×	✓	Media report

6.3. In sum

In this chapter we have relied primarily on indirect proxies to providing potential indications of conditions to foreign funding. On the basis of the sources reviewed it is not possible to derive any generalizable conclusion about possible conditions under which funding is provided. It appeared only possible to verify potential influence on the institutions' governance through a review of changes in board

membership over time from Chamber of Commerce records. In some cases, links to foreign funders and international intermediaries to specific institutions reported in the literature, media and by intelligence agencies appeared to correspond to board memberships form the same countries. This could be taken as an indication that the funder may have some influence on the management of or practices at these institutions. Yet caution is required, as nothing is known about the nature of these arrangements. Moreover, the frequency of foreign board membership in the purposive sample appears to be much higher than in the random sample, suggesting that those institutions featuring in the media are not representative for the entire population of mosques. Other data sources, such as court cases, provided no additional insights into funding conditions or influence beyond what was already reported in the media.

Attempts to further improve the quality of the current data are therefore unlikely to increase the possibility to generate insights into any conditions attached to funding.

7. Information available in source countries

In this chapter we review information on funding to Dutch Islamic institutions from six potential source countries. Through a systematic identification of publicly available information, this analysis aims to triangulate the information on foreign funding to Islamic institutions collected in the Netherlands with that available from funding countries. The country reports are listed in alphabetical order.

7.1. Kuwait

Like other gulf countries, Kuwait has experienced rapid development and societal transformation since the development of its oil economy starting in the mid-20th century. Since the beginning of the so-called Arab Spring in 2011, the country has witnessed significant political upheaval and demonstrations which in turn resulted in internal political shake-ups and elections (Katzman 2014). However, unlike other similar institutions in the region, Kuwait's parliament is considered to be a locus of significant political activity, and at times contention, where several currents and constituencies present in the country are represented vis á vis the Emir (Herb 2002, Salem 2007).

Demographically, Kuwait is dominated by migrant workers, making up 67per cent of the population. Many are blue-collar workers from South Asia. As in other oil-rich gulf states, the native population is well-taken care of and works mainly in the public sector. Tensions between foreigners and citizens build on existing urban-rural, Sunni-Shia and tribal rifts to further exacerbate political unrest (Bertelsmann Stiftung 2014).

7.1.1. Islam in Kuwait

Although Islam is the state religion and legislation is based on Shari'a law, the population enjoys a general respect for religious freedom. The native population is made up of roughly 70per cent Sunni and 30per cent Shia Muslims, but there is no significant strife between the two sects within the country (U.S. Department of States, Bureau of Democracy Human Rights, and Labor 2011).

As in other countries in the region, Kuwait registers the presence of various Salafist groups, practicing a strand of Islam seeking to return to a purer form of the religion. Salafists in Kuwait cannot be ascribed to one single current within the broader Salafi movement. On the contrary, groupings and formations are characterised by different attitudes and by the adoption of different strategies with regards to political mobilisation and its desired outcomes. This has had concrete implications over the activities of various groups active within the country in general, and within the parliament in particular (Monroe 2012, Wiktorowicz 2006). Furthermore, recently published reports seem to suggest that some independent

Kuwaiti-based Salafi groups are involved in the financing of various, and at times competing, rebel factions within Syria (Pall 2014).

7.1.2. Public sector institutions relevant to our study

The following section contains a brief overview of the most significant findings relating to the scope of this study. For an extended review of all institutions and organisations identified, as well as of the laws underpinning them and regulating their work, see Appendix B.

Table 7.1: Overview of Kuwaiti institutions reviewed and sources available

Body	Website	Annual Reports	Periodic Publications	Other Publications
Ministry of Foreign Affairs	✓	×	×	×
Ministry of Endowments and Islamic Affairs	✓	×	✓	✓
Ministry of Social Affairs and Labor	✓	×	×	×
Zakat State Fund	✓	✓	×	✓
Social Reform Society in Kuwait	✓	×	×	×
The General Secretariat for Charitable Work (Khair Online)- a branch of the Social Reform Society in Kuwait	✓	✓	✓	✓
International Islamic Charity Organization (IICO)	✓	✓	✓	×
Sheikh Abdullah Al Nouri Charity Society	✓	×	×	✓
Al-Najat Charitable Society	✓	✓	✓	✓
Islam Presentation Committee	✓	×	✓	×
Benevolent Work Charity	×	×	×	×
Direct Aid	✓	✓	×	✓

Ministry of Foreign Affairs (MoFA)

MOFA is primarily responsible for planning and implementing Kuwait's foreign policy objectives, overseeing foreign relations and protecting the countries and its citizens' interests abroad (wazārah al-khārjīah dawlit al-kuwait 2014). The ministry maintains a website, although all reports located are password protected. In a 2014 interview with an independent news source, the head of the administration of charities and charitable trusts (pursuant to the Ministry of Labor and Social Affairs), claims that all charities that wish to conduct projects abroad must go through MoFA. The standard procedure is that the charity contacts MoFA, then MoFA reaches an agreement with the foreign country in question. Funds for

the project are transferred from the charity to MoFA, and then to the relevant Kuwaiti Embassy for dispersal (al-Seyassah 2014).

Ministry of Endowments and Islamic Affairs

This ministry serves as a resource and centre for Islamic thought and activity within Kuwait. It also strives to influence societal development so that it is in keeping with Islam. Functions of the ministry include mosque administration, religious education, foreign relations and matters relating to the Hajj (wazārit al-iwqāf wa al-shūūn al-islāmīh 2014).

Although the ministry has a number of departments, none were found to provide meaningful information regarding the ministry's activities regarding work abroad. The department of foreign relations provides only a brief outline of its vision and activities, which do include the upkeep of mosques (Ministry of Awaqf & Islamic Affairs 2014). Although the ministry publishes a few magazines, none are relevant.

Ministry of Social Affairs and Labor (MOSAL)

MOSAL is primarily responsible for providing social services and regulating the labour market (Ministry of Awaqf & Islamic Affairs: Mosal 2014). The ministry's website is quite sparse. Although the ministry houses the Department of Charities and Charitable Trusts, which oversees charitable associations in Kuwait, no information on this department is provided (Ministry of Awaqf & Islamic Affairs: Mosal n.d.). Much relevant information is provided, though, from an independent news source's interview with the head of this department. This information is outlined in the section "Overview of Laws Regulating Charities" (See Appendix B.1).

Zakat State Fund

The Zakat House of Kuwait is responsible for collecting and disseminating the annual charitable tax in Kuwait (baīt al-zakāh 2014b). According to a recent Carnegie Middle East Center piece, members of the Salafi movement control the majority of collection centers, channelling funds to Syrian rebels (Pall 2014). The website for the Zakat House does not address these claims.

While the Zakat House does provide a brief overview of its foreign projects, which include mosque constructions, no specific projects or countries are mentioned (baīt al-zakāh 2014a). Available Annual Reports from 2005 to 2010 specify the budgets for different types of foreign funding (orphan care, relief work, etc.), but no countries are specified and mosque construction and funding are not mentioned. These are probably bundled under the category "Charity Projects" (Zakat House 2005). Other Zakat House publications, though, do mention mosque construction, outlining the number of mosques built globally in 2010, 2011 and 2012 (Zakat House, n.d.).

The Social Reform Society in Kuwait

Among other things, this society aims to fight social ills, promote Islamic solutions to public problems and guide young people to 'the correct way' (jama'īat al-islāh al-ijtimā'ī 2014). Annual reports and publications containing relevant information are issued from different secretariats and committees within the organisation.

The General Secretariat for Charitable Work was created in 1991 by the organisation's administrative council to unify the management and handling of all charitable projects for the Social Reform Society in Kuwait (a'īat al-islāh al-ijtimā'ī al-kuwait 2014a). Annual Reports and publications issued by this committee from 2008 onward were thoroughly reviewed alongside the organisation's website and other available publications. Current mosques' and education centres' construction projects are outlined on the organisation's website and available details relate to overall budget, money still needed for completion, timeline for execution, served community, and specific location within a country. Project costs range from about 11,000 to 49,000 USD (jama'īat al-islāh al-ijtimā'ī al-kuwait 2014b). According to these sources, the Social Reform Society carried out mosques and education centres' construction projects in various European countries, namely: the Ukraine, Bosnia, Bulgaria, Albania, Kosovo, and in the United Kingdom, but not in the Netherlands (jama'īat al-islāh al-ijtimā'ī al-kuwait 2014c, 2015). No traces of funding in connection to mosques' and education centres' building projects in the Netherlands were found (jama'īat al-islāh al-ijtimā'ī al-kuwait 2014b, 2014d). A number of other publications are available outlining Eid (i.e. religious festivities) donations, stories from the field, and projects in specific countries throughout Asia and Africa (jama'īat al-islāh al-ijtimā'ī al-kuwait 2014d).

The Sanabal Charity Committee, a branch of the General Secretariat for Charitable Work, reports, however, at least one project in the Netherlands. The 2008-2009 report outlines the new '*waqf* supporting the beloved'. One of its five projects is the establishment of a website on the Prophet Muhammad in the Netherlands. No further details were given. Donations in increments of 150 Kuwaiti Dollars (approx. 510 USD) can be made to the new waqf (presumably going to all five projects) (jama'īat al-islāh al-ijtimā'ī al-kuwait 2009, 18).

Sheikh Abdullah Al Nouri Charity Society

The Society's website provides a few publications on its various projects, although none mention the Netherlands or Western Europe (Sheikh Abdullah Al Nouri Charity Society 2014). According to an independent news source, the recently deceased founder of the society, Sheikh Nader Abd Al Azziz Al Nouri was a founding member of the board of trustees for the UK-based Islamic Relief Worldwide (sabar 2014). Under his reign and since the society's inception in 2001, the Al Nouri Charity Society had worked in 73 countries: of those, only the UK, Germany and the Netherlands were in Western Europe. It is of note that the Society selected the Netherlands as one of the few developed countries in which it worked. Again, no details concerning its work in the Netherlands are given (sabar 2014).

Islam Presentation Committee (IPC) (Branch of Al-Najat Charitable Society)

Publications available on the website provide very little information regarding Western Europe or the Netherlands. The IPC does publish magazines promoting Islam in different South Asian languages; however, given the large numbers of guest workers present in Kuwait originating from this region, the publications are probably targeted at migrants' communities residing in the country rather than at source countries (Islam Presentation Committee 2014).The one connection found to the Netherlands is a conversion story of a politician formerly affiliated with Wilders' PVV party, Arnoud van Doorn. It is not asserted, though, that he is in any way tied to the Islam Presentation Committee (Islam Presentation Committee 2014b).

According to an independent news source, the Islam Presentation Committee (IPC) provides two-week-long trainings in Kuwait to better equip European Imams and Advocates of Islam to bring the faith back to their homeland. The leader of The National Platform for New Muslims (LPNM) in the Netherlands has reportedly attended one of these trainings and has enacted his own annual one-day conference at The Hague promoting an accurate view of Islam among Europeans. Over 1,600 people from the Netherlands, Belgium and other parts of Europe attended the most recent gathering. Most importantly, the IPC of Kuwait is a supporter of LPNM. Details are not given, although the leader of the IPC has travelled to the Netherlands to observe and participate in LPNM activities (khān 2011).

7.1.3. Information on sample institutions

A thorough search using the guidelines above resulted in no identified connections between Kuwaiti Charities or Regulatory Bodies and Dutch Islamic Institutions. While most searches produced results, these were often news sources containing disparate pieces of information – one concerning the Netherlands, and one concerning Kuwait. No source was found that mentioned a specific Kuwaiti organization in Table 7.1 in relation to a Dutch Institution in the two samples.

7.1.4. In sum

Information provided by the charities listed in Table 2 is insufficient to discern whether they are actively involved in funding Islamic Institutions in the Netherlands. Roughly half of the charities had annual reports, and most had at least one type of publication. Still, these publications gave few details, especially concerning country location of projects. Secondary sources were not found to confirm claims as to the nature, progress, and budgets of projects. The Netherlands was mentioned only five times in relation to these charities, although only one specific project was mentioned (a website run by the Sanabal Committee), and no budget was specified. Out of these four mentions, only three actually come from a charity's publication, suggesting that those charities are either not funding projects in the Netherlands, or not publicly reporting on them.

As independent searches of Kuwaiti Institutions in Table 26 yielded very few connections to the Netherlands in the first place, it is not surprising that there is no publicly available information as to the presence and nature of Kuwaiti funding of any of 39 Dutch institutions in the sample.

7.2. Morocco

Morocco, after having been under French protection until the 1950s, is a constitutional monarchy uniquely shaped by its history of interactions with Europe, Africa, the Berber, and the Arab World. King Mohammed VI, who acceded to the throne in 1999, is only the third monarch to rule independent Morocco. His reign has so far been characterised by tentative and progressive reforms (Magharoui 2001, Willis 2009).

Partially as a result of Arab Spring protests in 2011, for the first time in Morocco an Islamic Party, the Justice and Development Party (JDP) won a majority in parliament that year. In accordance with the law, a Prime Minister from the JDP was also appointed by the king. Although the JDP is an Islamic Party, it heads a coalition composed of diverse political groups (BBC, 2014).

High unemployment (especially among youth), coupled with inflated prices for basic goods, will probably continue to lead many Moroccans to seek work abroad in the future (Haas 2014). Historically, Europe has witnessed the largest Moroccan emigration. As one of the most significant Diasporas there, Moroccans number roughly three million people in Southern and Western Europe alone (Haas 2014).

7.2.1. Islam in Morocco

The state religion of Morocco is Islam, and the population is almost entirely Sunni (99per cent) (CIA 2014). Although freedom of religion is guaranteed in the constitution, security forces effectively quell Shia Islam influence and diffusion by preventing literature from being spread and imprisoning leaders. The government justifies this suppression by asserting that the Shia movement is a front for Iranian influence (Berkley Center for Religion, Peace & World Affairs, n.d.).

Since JDP's majority win in parliament in 2011, Islamist parties are for the first time holding decision-making power (Spiegel 2013). JDP and parties like it are becoming more moderate, rather than more radical, reaching out to Europe to form partnerships as far back as 2007 (Amghar 2007, 1).

7.2.2. Public sector institutions relevant to our study

The following section contains a brief overview of the most significant findings relating to the scope of this study. For an extended review of all institutions and organisations identified, as well as of the laws underpinning them and regulating their work, see Appendix B.

Table 7.2: Overview of Moroccan institutions reviewed and sources available

Body	Website	Annual Reports	Periodic Publications	Other Publications
Ministry of Foreign Affairs and Cooperation	✓	×	×	×
Ministry of Endowments and Islamic Affairs	✓	✓	×	✓
Ministry of Employment and Social Affairs	✓	×	×	×
Al Noor Association for Social and charitable works	×	×	×	×
Islamic Charity Association	×	×	×	×
Solidarity Association for Social Business	×	×	×	×

Ministry of Foreign Affairs (MoFA)

The MOFA website does not clearly lay out its function, although we might reasonably assume that it is responsible for overseeing foreign relations and protecting the country's and its citizens' interests abroad. The website also does not contain any relevant publications or annual reports.

Ministry of Endowments and Islamic Affairs

This ministry oversees a number of Islamic institutions within Morocco, including mosques and waqfs. Functions of the ministry include mosque administration, religious education, foreign relations, and matters relating to the Hajj (wazārit al-iwqāf wa al-shūūn al-islāmīh, al-mumlakah al-maghrebīah 2014).

The ministry provides detailed record of its achievements from 2003 to 2011(wazārit al-iwqāf wa al-shūūn al-islāmīh, al-mumlakah al-maghrebīah 2012). Reports on its achievements concerning mosques and religious awareness (wazārit al-iwqāf wa al-shūūn al-islāmīh, al-mumlakah al-maghrebīah 2013a, 2013b) from 2013 were also reviewed. The religious awareness report mentions a study done determining the hardships that Moroccan mosques face abroad. The study looked at a number of countries, including the Netherlands (wazārit al-iwqāf wa al-shūūn al-islāmīh, al-mumlakah al-maghrebīah 2013, 23). These reports made no mention of the funding of foreign Islamic institutions.

Although the ministry has a number of departments, none were found to provide meaningful information regarding the ministry's activities regarding work abroad.

Ministry of Employment and Social Affairs

This ministry is responsible for promoting the welfare of the labour force and the society as a whole through planning and implementation of government policy. The ministry also carries out various programs such as adult education and literacy (al-mumlikah al-maghrebīah wazārit al-tashghrīl wa al-shūūn al-ijtimā'īah, n.d.) The official website did not provide any annual reports or publications.

7.2.3. Information on sample institutions

A thorough search using the guidelines above resulted in no identified connections between Moroccan Charities or Regulatory Bodies and Dutch Islamic Institutions. Only a few searches produced results, and these were often news sources containing disparate pieces of information – one concerning the Netherlands, and one concerning Morocco. When Dutch Institution names were not searched as a phrase, the overwhelming majority of results did not relate to that institution at all. No source was found that mentioned a specific Moroccan organization in Table 7.2 in relation to a Dutch institution in the two samples.

7.2.4. In sum

Information provided by the above charities is insufficient to discern whether they are actively involved in funding Islamic institutions in the Netherlands. These charities do not maintain websites or publicly available records concerning any potential dealings or projects they may have in the Netherlands. Moreover, no information regarding regulation of charities was found in publicly available documentation from the Government bodies specified in Table 7.2. It is unlikely that there is enough publicly available information to provide a meaningful understanding of regulatory mechanisms for charities in Morocco.

There is also a lack of verified information about any connections between the Dutch Islamic institutions in the sample and Moroccan bodies discussed above. Independent searches of Moroccan Institutions in Table 7.2 yielded very few connections to the Netherlands in the first place. It is unlikely then, that

publicly available information will provide any substantial information as to the presence and nature of Moroccan funding of these Dutch Islamic Institutions.

7.3. Qatar

Only a century ago, nowadays Qatar was one of the poorest regions in the Middle East. Since the discovery of oil and natural gas, the country has developed speedily and now boasts the highest per capita income in the world (roughly 93,000 USD in 2013) (The World Bank 2014). Qatari Citizens make up a small minority of the population (roughly 12.5 per cent of about two million residents) (U.S. Deparment of State 2013). The other residents, roughly 1.8 million people, are guest workers largely from South Asia and other Arab countries, along with a few Western Europeans and North Americans (Snoj 2013). In the past decade, Qatar has become a major political player in the Middle East. Although Qatar is ruled by an authoritarian monarchy which publicly denounces terrorism, speculations and rumours have emerged with regards to private Qatari funding being supplied to various rebel factions active inside Syria (Dickinson 2014). Furthermore, recently published media reports, citing U.S. government sources, have also indicated the possible presence on Qatari soil of U.S. and UN designated terrorist financiers with links to transnational terrorist networks (Mendick 2014).

7.3.1. Islam in Qatar

The official religion of Qatar is Islam, and the vast majority of its citizens are practicing Sunnis, although Shias are also able to practice their creed in peace (U.S. Deparment of State 2013).As for other countries in the region, reports indicate the presence of groups adhering to different strands of the so-called Salafi Islam (see Section 2.2.4)(Pall 2014). Recently published media reports seem to suggest the existence of potential links between some of these Qatari-based religious networks and militant groups active in hotspots throughout the region (Dickinson 2014).

7.3.2. Public sector institutions relevant to our study

Little information was found on the government sites as to how the Qatari government regulates charitable work abroad. In fact, the only relevant regulatory information found comes from the Administration of Private Associations and Institutions governed by the Ministry of Labor and Social Affairs. Still, the information provided is simply a list of private institutions (some of which do work abroad), outlining no mechanisms whatsoever as to how this foreign work is regulated. It is unlikely, therefore, that further investigation into information publicly available from the government bodies in Table 7.3 will result in detailed records of charitable work abroad, or of regulatory mechanisms. The following sections provide more details on individual agencies based in Qatar. For an extended review of all institutions and organisations identified, as well as of the laws underpinning them and regulating their work, see Appendix B.

Table 7.3: Overview of Qatari institutions reviewed and sources available

Body	Website	Annual Reports	Periodic Publications	Other Publications
Ministry of Foreign Affairs	✓	×	×	✓
Ministry of Endowments and Islamic Affairs	✓	×	×	×
Ministry of Labor and Social Affairs	✓	×	×	×
State Zakat Fund	✓	✓	✓	×
Qatar Charity	✓	×	✓	×
Sheikh Eid Bin Mohammad Al-Thani Charity Association	✓	✓	✓	✓
Sheikh Jassim bin Jaber bin Mahmoud Al-Thani Charity	×	×	×	×
Dawa Qatar	✓	✓	×	×
Al-faisal Foundation	✓	×	×	×
Sheikh Thani bin Abdullah Foundation for Humanitarian Services (raf)	✓	✓	×	×

Ministry of Foreign Affairs (MOFA)

The Ministry of Foreign Affairs functions to protect Qatar's interests abroad, plan and implement foreign policy (with the Emir's approval), and serve as an interface between other Qatari ministries and foreign entities – be they state or non-state actors (wazārit al-khārjih, dawlit Qatar 2014a) No evidence was found with regards to that effect. The Ministry maintains a website, and although internet searches produced traces of annual reports, no actual documents were located. The ministry has published a number of reports in English and Arabic, although these have nothing to do with foreign charitable fundraising (wazārit al-khārjih, dawlit Qatar 2014b) No other searches related to Qatar mentioned the Ministry of Foreign Affairs' involvement in any Qatari Charity's work abroad.

Ministry of Labor and Social Affairs (MOLSA)

In general, MOLSA manages the Qatari labour market and oversees social development within the nation (Ministry of Labour & Social Affairs 2014). One of its branches, the Administration of Private Associations and Institutions, is responsible for overseeing all charitable organizations within Qatar (Sheikh Thani Bin Abdullah Foundation for Humanitarian Services 2010).This administration provides the only useful information identified on MOLSA's website – a list of 22 private organizations under its supervision. Some of these are charities, while others are professional organizations, such as the Society for Petroleum Engineers. A number of charities mentioned in this list are active abroad, providing funding for humanitarian causes, mosque construction, and religious education. No indication as to whether this list is exhaustive was provided. It is also unclear whether this list is up to date (wazārit al-'amal wa al-shūūn al-ijtimā'īh, dawlit qatar, n.d.).

State Zakat Fund

The State Zakat Fund, overseen by the Ministry of Endowments and Islamic Affairs, is responsible for collecting the Zakat tax from the rich and disseminating it to various charitable causes, mostly within Qatar. It is unclear whether this tax is obligatory or not (şandūq al-zakāh al-qatari 2014). Available Annual Reports from 2008-2009 and 2009-2010 outline charitable projects abroad. Descriptions include budget and type of project (orphan care, funding for the Iftar during the Eid Celebration, etc.), specified by country. No mention of mosque construction, religious education, or the Netherlands was made (şandūq al-zakāh al-qatari 2009, 23-26; 31-34).

Other information regarding this fund comes from irregular magazine publications, although a review did not provide information relevant to the Netherlands. The Zakat Fund is mostly active within Qatar with projects aiming to provide economic support to needy families and students. The organization provides a free service to companies for calculating their Zakat: over the years it has signed a number of agreements transferring companies' Zakat directly to the fund. The fund also receives and pays visits to various partner countries and organizations, although the Netherlands is not mentioned as one of them (şandūq al-zakāh al-qatari 1997).

Qatar Charity (QC):

Little information relevant to the Netherlands was found on Qatar Charity's website. While other Northern European countries are Qatar Charity partners, the Netherlands is not (Qatar Charity 2014b) Annual reports on the website were encrypted and impossible to open without a password. Current projects outlined mosque constructions in Europe, but none in the Netherlands. Few details except for project expenditure and brief goals were provided for each (Qatar Chairy 2014a). Only three issues of the QC magazine "Giras" were located (February and June 2012, and an unspecified month in 2013). Although the magazine outlines current charitable projects, no issue made mention of the Netherlands (Qatar Charity 2012, 2013, 17).

An article published 2012 on Qatar Charity's website identifies a Sheikh Al Hammadi as a primary broker for an approx. 7.5 million USD, (partially) Qatar Charity-funded mosque construction project in Sicily (Qatar Charity 2012, 2013). Further searches identified Al Hammadi as a primary broker in other Mosque Construction projects in Denmark and France, although it is unclear which, if any, charity in Qatar may be involved. The source for the project in France is questionable information from a forum, unconfirmed by other sites (al-majlis al-islāmī al-dānmarkī 2014, shubkat al-as'ham al-qatarīh 2011).

The Muslim Council of Denmark names Al Hammadi as one of the most important Islamic personalities in Qatar in regards to marketing the Khair al-Baria mosque construction project in Denmark (al-majlis al-islāmī al-dānmarkī, n.d.) and a March 2014 post on his Twitter account thanks donors for their help in converting a Dutch church into a mosque (although no other details concerning this were found) (BusalahQa 2014). His Twitter account also calls for donations of approx. 3.5 USD per day to Qatar Charity to support mosque construction in Europe. It displays a number of pictures of European Mosque projects (none in the Netherlands) (BusalahQa 2013). Al Hammadi also periodically appears on Qatar TV giving religious addresses after the Call to Prayer (Qatar Television Webpage 2014). He is a member of the World Union of Muslim Scholars, a group headed by the Muslim scholar Yusuf Al-Qaradawi (al-

itihād al-'ālamī l'ūlama al-muslimīn, n.d.). Al Hammadi proved to be the most prominent individual identified in this study linking Qatar to European mosque construction projects. It is unclear as to whether he works exclusively with Qatar Charity or not.

7.3.3. Information on sample institutions

A thorough search using the guidelines above resulted in no substantial connections between Qatari Charities or Regulatory Bodies and Dutch Islamic Institutions. While most searches produced results, these were often news sources containing disparate pieces of information- one concerning the Netherlands, and one concerning Qatar. When Dutch Institution names were not searched as a phrase, the overwhelming majority of results did not relate to that institution at all. No source was found that mentioned a specific Qatari organization in Table 2 in relation to a Dutch Institution on the Sample List.

7.3.4. In sum

Information provided by the above charities is sparse and fairly unreliable. Secondary sources were generally not found to confirm claims as to the nature, progress, and budgets of projects. Only a few charities provided annual reports, and only a portion of these gave country-specific details. This makes it impossible to draw concrete conclusions as to whether or not any charity is actively involved in funding Islamic institutions in the Netherlands.

The lack of verified connection between the Dutch Islamic institutions in the sample and Qatari organizations in Table 7.3 is unsurprising for two reasons: first, when Arabic translations of these Dutch institutions' names were searched alone, very few, if any, results were found. Second, independent searches of Qatari Institutions in Table 7.3 yielded very few connections to the Netherlands in the first place. It is unlikely then, that publically available information will reveal any substantial information as to the presence and nature of Qatari funding of these Islamic institutions in the Netherlands.

7.4. Saudi Arabia

As is the case of some of the other countries discussed in this chapter, Saudi Arabia represents a case of rentier state whose development, both at the economic and demographic levels, was spurred by the discovery and commercial exploitation of vast oil reserves in the second half of the twentieth century. From an institutional point of view, the country is organised as a Monarchy, headed since its establishment by the Ibn Saud family, and holds the Quran and Shari'a as its legal bases. Since its establishment, and even during the eras of the two previous Saudi states in the eighteenth and nineteenth century, Saudi Arabia's leadership and elites made an extensive use of religious themes and Islamic undertones to bolster their legitimacy. In particular, since the eighteenth century, the house of Ibn Sa'ud has maintained an active alliance and partnership with the Wahhabi movement established by Mohammed Ibn 'Abd al-Wahhab (Armajani 2012). This movement was developed starting from the teachings of the traditional and strongly conservative Hanbali School of Islamic jurisprudence and by further developing its scripturalist and orthodox dimensions. In a sense, the Wahhabi movement anticipated certain instances brought up by Salafi movements that embraced the need to return to a pious and 'rightly guided' conduct of life (i.e. mirroring that of the Prophet Muhammad and the four rightly

guided caliphs). Since the establishment of the Saudi state, this has led to a situation of mutual support whereby state-aligned Saudi Islamic scholars are supported economically in their work and proselytism activities by the country's political leadership in return for a legitimation of the rule of the house of 'Ibn Saud. Even today, the role played by official Ulama (i.e. scholars) affiliated with the Saudi state is crucial in legitimizing state policies and cannot be overstated, both in times of crisis and peace (Korany & Fattah 2008). By means of example, it is worth mentioning the issuing of a fatwa by Saudi scholars in the wake of Iraq's invasion of Kuwait to grant legitimacy to the arrival of foreign non-Muslim troops on Saudi soil (Alhargan 2012).

The pervasiveness of Islamic undertones employed by the Saudi establishment to legitimise its position is also well exemplified by the official title of the Saudi Head of State who in Arabic is not called king, since this title belongs to God only, but rather 'the Custodian of the Two Holy Mosques', in a bid to underline the crucial role played by the Saudi leadership in granting protection and access to Islam holy places for Hajj and 'Umra' (Al-Rasheed 2013).

7.4.1. Islam in Saudi Arabia

The population of Saudi Arabia is currently assessed around 27 million people, with expatriate workers representing almost a third of it, according to the latest Saudi census (Royal Embassy of Saudi Arabia Washington Webpage 2014a). The vast majority of the population believes in Sunni Islam, but a sizeable Shia minority comprising approximately 10 per cent of the total population is present in the oil-rich eastern region of the country. The presence of this minority has at times represented a source of contention for the country's ruling elites, which still limit Shias religious freedom of practice (U.S. Department of State 2012). Furthermore, despite attempts by the Saudi state to present itself as a bulwark of Sunni Islam in the world, Saudi Arabia was and is home to several grassroots Islamist movements (Lacroix 2011). Since the early 1970s, and even more so after the events of the 1979 siege of the Holy Mosque and the arrival of U.S. troops on Saudi soil during the first Gulf War, Saudi Arabia witnessed first the development of the so-called 'awakening movement' and then the proliferating of various strands of Salafi Islam, including that of its most militant Jihadist versions (Hinnebusch 2003, 121-134, Korany & Fattah 2008). These Islamist movements often maintain a critical stance towards the Saudi state establishment accusing it of moral corruption and of upholding Islamic values only on paper. Furthermore, the increased perception that state affiliated Ulama would rubber stamp any decision taken by the country leadership with regards to issues outside of personal status matters has led many Saudis to refer to independent scholars and Ulama. (Al-Saif 2014, Lacroix 2014) Independent scholars would then gradually coalesce in social movements focusing on pious and charitable activities and then morph into more political ones with an inherently contentious nature (Al-Saif 2014, Lacroix 2011). As a result of this, and even more so after the events of 9/11, despite its broad international alignment with the U.S. and its Western allies, the country has come under increased scrutiny as a source of both funding and recruits for terrorist groups active on the regional and global scenes (Cordesman 2006, Hegghammer 2006).

As part of its foreign policy predicated upon Islamic values and to further substantiate its bid as leading Islamic country, Saudi Arabia has donated substantial amounts of aid to Muslim countries and populations since the 1970s (Ministry of Foreign Affairs 2013). A summary of institutions, bodies, and

charities reviewed for Saudi Arabia due to their involvement in Islamic affairs or foreign aid disbursement can be found in Table 7.4.

Table 7.4: Overview of Saudi institutions reviewed and sources available.

Body	Website	Annual Reports	Periodic Publications	Other Publications
Ministry of Social Affairs	✓	×	×	✓
Ministry of Islamic Affairs, Endowments, Da'wah and guidance	✓	✓	×	×
Department of Zakat and Income Tax	✓	×	×	✓
Saudi Fund for Development	✓	✓	×	✓
King Abdullah's Relief Campaign for Pakistani People	✓	×	×	×
Saudi Charity Campaign for the Relief of the Earthquake and Tsunami Victims in East Asia	✓	✓	×	×
Saudi Popular Charitable Campaign for the Relief of the Lebanese People	✓	✓	×	×
Saudi Council for the Relief of the Iraqi People	✓	✓	×	×
Saudi National Campaign for the Support of Brothers in Syria	✓	✓	×	×
Saudi Council for the Relief of the Palestinian People	✓	✓	×	×
Custodian of the Two Holy Mosques Campaign for the Relief of the Palestinian People in Gaza	✓	✓	×	×
National Saudi Campaign for the Relief of the Somali People	✓	✓	×	×
Muslim World League	✓	×	×	✓
Islamic Group for Fiqh	✓	×	×	×
International Islamic Relief Organization	✓	✓	✓	×
Holy Quran Memorization International Organization	✓	✓	✓	✓
Muslim International Authority for Education	✓	×	×	×
International Authority for the Muslim Woman and Family	✓	×	×	×
Mecca Charity	✓	×	×	✓
International Authority for New Muslims	✓	×	×	×
International Commission on Scientific Signs in Quran and Sunna	✓	×	✓	✓

Body	Website	Annual Reports	Periodic Publications	Other Publications
World League for Introduction to Islam	✓	×	×	×
Islamic International Foundation for Economic & Finance	✓	✓	×	×
International Organisation for Reconstruction and Development	✓	✓	×	×
High Authority for the Coordination of Islamic Organisations	✓	×	×	×
World Authority for Muslim Ulama	✓	×	×	×
The Global Commission for Introducing the Messenger	✓	×	×	✓
International Islamic Organisation for Halal	✓	×	×	×
Lawyers International Islamic Organisation	✓	×	×	✓
Physicians Across Continents	✓	×	×	×
International Commission for Human Development	✓	×	×	×
International Commission for Technological Means	✓	×	×	×
Masajid International Organisation	✓	×	×	×
King Faisal Foundation	✓	✓	×	×
King Abdallah bin 'Abd al-'Aziz Charity [Dedicated to His Parents] for Housing Development	✓	×	×	×
World Organisation of the Custodian of the Two Holy Mosques for Charitable and Humanitarian Work	×	×	×	×
Barakah Charity	✓	×	×	×
Saudi Red Crescent Authority	✓	×	×	×
Alwaleed Bin Talal Foundation	✓	×	×	×
Saudi Charity Association for AIDS Patients	✓	×	×	✓
Awasser Charity Organisation	✓	×	×	×
Albasar International Foundation	✓	×	×	✓
Hussein Abdulatif Charity Foundation	✓	×	×	×

7.4.2. Public sector institutions relevant to our study

An extensive review of all the institutions, bodies and organisations identified in Saudi Arabia and listed in Table 7.4 produced a limited amount of results relevant to the scope of this study and highlighted a general paucity of publicly available information and details concerning the work of these institutions. The following section contains a brief overview of the most significant findings relating to the scope of this study. For an extended review of all institutions and organisations identified, as well as of the laws underpinning them and regulating their work, please refer to Appendix B.

Ministry of Social Affairs

The Ministry of Social Affairs was established in 1960 in a bid to promote and regulate social welfare organisations in the country. The ministry maintains through its website a list of all Saudi charity organisations it has licensed and registered, the total of which exceeds 900 groups and organisations. However, due to the existing regulations (see Appendix B), which limit the activities of organisations approved by the Ministry of Social Affairs to areas within Saudi Arabia only, no further information relevant to the scope of this study could be identified.

Ministry of Islamic Affairs, Endowments, Da'wah and Guidance

Established, in 1993, this ministry and its agencies cover all Islamic affairs related issues within the Kingdom of Saudi Arabia, and da'wah related affairs outside of it (Ministry of Islamic Affairs, Endowments, Da'wah and guidance 2009). In particular, it is tasked with: promoting Islam and related values in Saudi Arabia and abroad, building and maintenance of mosques and Islamic centres, regulation and monitoring of Islamic endowments, preparation and distribution of books, and publications relating to Islam, including the Quran (Ministry of Islamic Affairs, Endowments, Da'wah and guidance 2009). A review of the ministry website and of the annual reports and leaflets available through it highlighted the existence of an international dimension to the activities of the ministry. However, data available was marred by a general paucity of details and little more than generic information about the volume of activities carried out abroad was encountered. In particular, the Ministry actively sustains preachers dispatched outside of Saudi Arabia, participates to international conferences and meetings pertaining to its areas of interest, translates and prints books relating to Islamic issues in several languages. No further information relevant to the scope of this study could be identified.

Department of Zakat and Income Tax

The Department of Zakat and Income Tax (DZIT) is a Saudi government agency that reports to the Ministry of Finance and oversees matters relating to Zakat (Department of Zakat & Income Tax 2014a). In Saudi Arabia, the payment of Zakat is compulsory for all Saudi citizens and nationals of Gulf Cooperation Council (GCC) member states. The DZIT is tasked with collecting Zakat payments from relevant individuals and businesses located in the country, promoting social awareness of and compliance with the concept of Zakat and prosecuting delinquent organisations and individuals defrauding Zakat payers by diverting their alms (Department of Zakat & Income Tax 2014b, 2014c). With regards to this last issue, according to news sources, the DZIT appears to be actively trying to prevent the allocation of Zakat payments to ideologically 'deviant' groups and organisations (Al-Shorfa 2014). Payments collected

by the DZIT are destined to projects undertaken by the Ministry of Social Affairs with the goal of advancing societal welfare within the country and assisting low-income families and needy individuals.

Muslim World League

The Muslim World League, international non-governmental Islamic organization based in Saudi Arabia (MWL 2004i), maintains an Islamic cultural centre in Tilburg which assists local Muslims by providing religious assistance services, such as family related counselling, religious courses and classes, and seasonal activities (e.g. Ramadan gatherings, etc.) (MWL 2004a). For a detailed review of all bodies affiliated with the organisation as well as of the materials and sources available through each organisation's website please refer to Appendix B.

7.4.3. Information on sample institutions

With regards to the links between the Saudi bodies reviewed above and the Dutch institutions in our two samples, we found that most searches yielded very few results, which often did not pertain to the scope of this study. In two instances it was possible to identify the participation of members representing Dutch institutions in our sample list to conferences organised by a Saudi based organisation linked to the Muslim World League. Additionally, a prominent member of one of the Dutch based organisations appeared to have previously been affiliated with the Muslim World League. In another instance, it was possible to identify the participation of a Dutch institution located in Zuid-Holland to an initiative run by a Saudi based university. Lastly, a few searches evidenced that the activities of a Dutch institution based in one of the country's largest cities were reported a number of times by websites linked to the World Muslim Organisation, but no clear linkage between the two could be identified.

7.4.4. In sum

In recent years, Saudi Arabia seems to have developed a thorough set of legislations aimed at monitoring and keeping track of financial movements and activities of charities and welfare organisations active inside the country (for further details see Appendix B). Furthermore, existing legislations limit the scope of activity of state-registered charities to the Kingdom of Saudi Arabia only, leaving the possibility to conduct charitable work outside of the country only to a handful of state-run or state-registered charities. Besides various state-run relief funds, one such example is represented by the Muslim World League, an international non-governmental organisation active across the world, but whose headquarters are located in Saudi Arabia. However, a thorough review of the organisation's website, as well as of those belonging to the various NGOs connected to the MWL, evidenced a scarcity of publicly available information with regards to funding and activities carried out by these NGOs in the Netherlands and, more broadly, outside of Saudi Arabia.

As a result, it was not possible to determine the extent to which Saudi-based charities active on the international stage are actually connected to religious institutions in the Netherlands. Unsurprisingly, even the undertaking of a systematic cross-checking between institutions on our sample lists and identified Saudi organisations, listed in Table 29 above, allowed the research team to highlight only a limited number of tenuous links.

7.5. Turkey

The Republic of Turkey is a democratic, secular, unitary, constitutional republic. The population of Turkey is over 76 million (Turkish Statistical Institute homepage 2014). About 70–75 per cent of the population are Turks. Kurds constitute the largest ethnic minority (18 per cent of the population) in Turkey (CIA 2014). In 2014, the GDP of the country was over 820 billion USD (653.8 billion Euros) (Turkish Statistical Institute 2014). The real growth rate of the economy was 4.0 per cent in 2013 (Turkish Statistical Institute 2014). Unemployment rate in August 2014 was 10.1 per cent (Turkish Statistical Institute 2014).

7.5.1. Islam in turkey

Although Turkey is a secular country, Islam plays quite an important societal role. According to the CIA World Factbook, 99.8 per cent of the population are Muslims (CIA 2014). The majority of the Muslim population are followers of Hanafite school of Sunni Islam.[23] Turkey also has Shiite denominations of Islam like Alevis (15 to 20 million)[24] and Twelver Shias.

The secularization of Turkey started after the end of World War I with the demise of the Ottoman Empire, which was an Islamic state, and the establishment of a secular republican Turkish state. Secularization of modern-day Turkey is particularly associated with Mustafa Kemal, the charismatic post-war Turkish leader and President who since 1934 came to be known with the honorific surname of Atatürk ('Father of the Turks') which was bestowed upon him posthumously (Rustow 1968). One of the six pillars of *Kemalism,* the founding ideology of the Republic of Turkey, is *laiklik* (secularism). Like French secularity, *laïcité,* Turkish *laiklik* promotes the absence of religious interference in government affairs and the absence of government in religious affairs. It has also been pointed out that the Presidency of Religious Affairs (Diyanet Işleri Başkanlığı –DIB), a Turkish government organization in charge of religious affairs, is similar to the French *Bureau Central des Cultes* in terms their tasks and responsibilities (Gözaydın 2008).

The 1960s and 1970s witnessed the rise of numerous Islamic political movements in Turkey. Some of the most influential movements like *Milli Görüş* and *Gülen* were developed in these decades. Necmettin Erbakan's *Milli Görüş* ideology gave rise to several Islamist political parties, some of which were banned because of their "anti-secularist activities". Erbakan's Virtue Party was one of them. After the ban of this party in 2001, a group of "reformists" split from *Milli Görüş* and founded the incumbent Justice and Development Party (AK Party).

Turkish Islamic Institutions and Organizations in the Netherlands can be broadly classified into two groups: 1) groups which are closely related and associated with the Turkish Government (in most of the cases with DIB) and, 2) groups that are not associated with the Turkish Government. Turkish Islamic

---

[23] According to Wikipedia, Hanafi and Shafii Sunnis make up 70-85% of the population in Turkey. However, source for these numbers are not reported.

[24] The U.S. Department of States, Bureau of Democracy, Human Rights, and Labor (2007) mentions that "…academics estimated there were 15 to 20 million Alevis…" However, there are no references for the estimates.

Cultural Foundation (TICF) and *Hollanda Diyanet Vakfi* (HDV – also known as *Islamitische Stichting Nederland*, (ISN)) are the two biggest networks that belong to the first group. These two organizations seem to be the most influential Turkish religious organizations in the Netherlands. For example, according to HDV's website there are about 200 Turkish mosques in the Netherlands, and 142 of them are associated with HDV (HDV homepage 2014). The Dutch Islamic Centre Foundation of Netherlands (SICN – also known as *Süleymancis*), *Milli Görüş* Nothern Nederlands (MGNN) and Dutch Federation of Alevi and Bektashi Associations (HAK-DER) are examples to the organizations not directly associated with the Turkish Government.

7.5.2. Public sector institutions relevant to our study

An extensive online search of the government agencies and public organizations listed in Table 7.5 did not reveal any substantial information on the size of funding of Turkish Islamic institutions in the Netherlands. However, it gave some understanding of how some of the Dutch religious institutions are connected to the Turkish government. This section provides the brief overview of the most significant findings that are relevant to the scope of this study.

Table 7.5: Overview of Turkish institutions reviewed and sources available

Body	Website	Annual Reports	Periodic Publications	Other Publications
The Presidency for Religious Affairs (Diyanet İşleri Başkanlığı -DİB)	✓	×	×	✓
Turkish Religious Foundation (Türk Diyanet Vakfı)	✓	×	×	✓
Ministry of Finance	✓	✓	×	×
The Turkish Consulates and The Embassy in the Netherlands	✓	×	×	×
Hollanda Diyanet Vakfı –HDV (Islamitische Stichting Nederland-İSN)	✓	✓	✓	✓
Milli Görüş	✓	×	×	✓

The Presidency for Religious Affairs (Diyanet Isleri Baskanlıgı -DİB)

The Presidency for Religious Affairs, established in 1924, is responsible for '…dealing with issues related to Islamic beliefs, worship and moral principles; enlightening society about religion and managing the worship places…'.[25] DIB regulates the operation of the country's registered mosques (over 85,000 (The Presidency of Religious Affairs 2014)) and employs local clergy at these mosques. According to the

[25] 633 sayılı *Diyanet İşleri Başkanlığı Kuruluş ve Görevleri Hakkında Kanun*, 1965 ("The Law on the Establishment and Duties of the Presidency of Religious Affairs", Law number 633, year 1965).

Turkish Ministry of Finance, the actual public budget expenditures on recreational, cultural and religious services was 8 874 million TL (about 3 107 million Euros) in 2013 (The Presidency of Religious Affairs 2014). More than half of these funds were allocated to DIB in the same year. DIB's budget was 4.6 billion TL (over 1.6 billion Euros) in 2013 (Milliyet Gazetesi 2014).

DIB also has the General Directorate for Foreign Affairs. It seems that through that Directorate, DIB also appoints some of the religious clerks for the organizations which are located abroad, but affiliated with DIB. For example, in the fall of 2013, the Directorate issued an announcement on 'The Examination for Contracted Religious Clerks Abroad' (DIB 2014). According to this announcement, the Directorate is searching for candidates who have the following skills and characteristics, among other things:

a. Having citizenship or permanent residency in the host country;
b. Having at least an undergraduate level or equivalent educational degree in religious studies (Islam);
c. Being proficient in the official language of or commonly used language in the host country;
d. Being proficient in Turkish
e. Being known to have faith, attitudes and actions that conform to Islamic traditions.

Turkish Religious Foundation (Türk Diyanet Vakfı -TDV)

TDV was established in 1975 in order to support the services of DIB. We found a report on TDV's activities in various countries that was a 2014 response to an information request from the Turkish Parliament. It contains information on mosque construction/repair/operation and maintenance supported by TDV in different countries like Azerbaijan, Denmark, Germany, Kyrgyzstan, Sweden and others. However, we did not find any information on the Netherlands in this report (The Turkish Parliament 2014).

Hollanda Diyanet Vakfı –HDV (Islamitische Stichting Nederland-İSN)

HDV (ISN) was established in 1982 under the auspices of the Republic of Turkey, the Presidency of Religious Affairs (Diyanet Işleri Başkanlığı-DIB). HDV's website lists 10 people as the founders of the organization. The first two of them are Tayyar Altikulac, the President of DIB from 1978 to 1986, and Sami Uslu, the former Vice-President of DIB. Moreover, current president of HDV, Dr. Mustafa Ünver, is also the Counsellor for Religious Affairs at the Turkish Embassy in Netherlands. In fact, all HDV presidents were either the Counsellors for Religious Affairs or the attaches at the Turkish Embassy in The Hague. Moreover, HDV's General Board includes The President of DIB, The Head of the External Affairs at DIB, the Counsellor for Religious Affairs, and 14 other members (HDV 2014d).

HDV has quite a large network in the Netherland. It has 12 regional representatives in the country. According to HDV's website there are about 200 Turkish mosques in Netherlands. Hundred and forty two of them are associated with HDV.[26]

HDV publishes annual activity reports.[27] However, these reports usually do not contain any information on financial issues. HDV activities involving finances include Education and Training scholarships (HDV

---

[26] For the list of HDV mosques and departments see: HDV (2014g).

2014a), Funeral Assistance Fund (HDV 2014b), and Fitre-Zekat Fund (2014c). HDV also funds the salaries of imams serving at HDV mosques.

HDV has also conducted fundraising campaigns for various charities in the past. For example, in July of 2014, HDV launched a campaign to fight poverty inside the Netherlands (TDV 2014). Between November 2013 and February 2014 the HDV also raised 57,000 Euros for refugees from Syria (Sonhaber.nl 2010), and half a million Euros for people affected by the earthquake in Pakistan was raised in 2010 (Haberler.com 2010).

HDV appears to supervise and control the mosques associated with the organization. According to HDV's website, the Turkish religious advisors and attaches came together for a conference on HDV management and internal control (audit) on 14.09.2014. It is mentioned that HDV's Supervision and Internal Control Commission has audited/controlled 110 mosques (HDV 2014f). [28]

HDV also includes the Construction Commission, which was established in 2012 (HDV 2014e). The Commission provides: a) guidance to the HDV branch managers in purchase, design, and construction of buildings; b) recommendations on financial, legal, and construction issues; c) information to the HDV Board of Directors on the relevant issues. However, we did not find any evidence of HDV funding any construction work.

'HDV Department Regulations' (HDV 2012) mentions the following income sources for the organization: a) Membership fees; b) Grants made by public authorities/organizations; c) Donations made by organizations and individuals; d) Revenues from book, food and other sales; e) Other legal income. Nevertheless, we were not able to estimate the magnitude and importance of each of these sources in an online search.[29]

Milli Görüs in the Netherlands

Milli Görüş (National Vision) is one of the leading Turkish Islamist Diaspora organizations. Like HDV, Milli Görüş in the Netherlands also has a Fitre and Zekat Fund, as well as a Funeral Assistance Fund. Milli Görüş's website notes that people can donate their fitre and zekat to the nearest Milli Görüş branches (Milli Görüş 2014). The website states that Milli Görüş distributes the Fitre and Zekat funds to the deprived and needy (Milli Görüş 2014). Milli Görüş has also launched a charity campaign 'One Euro per Day for the Deprived and Poor' (Milli Görüş 2014). However, we were not able to estimate the scale of this campaign.

[27] For activity reports from 2013 and 2010 see: Diyanet (2011, 2014)

[28] The form that HDV uses for auditing the mosques can be downloaded from: http://diyanet.nl/wp-content/uploads/standart/pdf/2014/HDV%20Denetleme%20ve%20Rehberlik%20Raporu.pdf.

[29] We also tried to find an annual audit report for HDV. However, we were not able to identify the auditor of HDV. We used the names of the big four auditing companies, as well as word "auditor" ('*denetçi*'), in combination with HDV, but did not get any relevant results.

7.5.3. Information on sample institutions

To further verify the availability of information in the public domain regarding links between the Turkish public sector institutions and Islamic institutions in the Netherlands, the research team carried out a set of cross searches pairing the Dutch institutions in the sample and Turkish institution reviewed above.

With regards to Turkish bodies and Dutch institutions selected, the research team found that most searches yielded very few results, which often did not pertain to the scope of this study. However, it was possible to identify the links between Turkish government and 8 institutions in the two samples of 39 Dutch Islamic Institutions. These institutions were part of the HDV (ISN), which is established under the auspices of the Republic of Turkey, the Presidency of Religious Affairs (*Diyanet İşleri Başkanlığı*).

Institutions associated with HDV

Eight organizations in the sample list of 39 Dutch Islamic institutions are associated with HDV. We found only three relevant web articles while searching for HDV related organizations in the sample list. Two of these articles concerned the opening of two new HDV mosques. The articles mention that construction costs of each mosque were about 4 million Euros. These articles do not provide much information about the funding sources for the constructions. One of these articles simply mentions that the funds for the construction were raised by the Turkish Muslim community, by the communities of the other HDV mosques and Turkish Muslims living in different European countries. The third article is about the establishment of an HDV mosque in a large city in the Netherlands. According to this web article, the mosque was founded in 1981, and the place for the mosque was bought for 230 thousand guilders. It seems that the money was raised through private donations. However, the article mentions that sometime after 1982, HDV started to finance the salaries of the imams in this mosque. According to this article, throughout the mosque's history HDV provided salaries to at least nine imams. It is also mentioned that a new place for the mosque was bought after 2010, but it is not clear how the purchase was financed.[30]

Institutions not associated with HDV

We found an article about the start of construction of a non-HDV Turkish mosque in Amsterdam. It mentions that the construction to be estimated to cost about 5.2 million Euros. The construction started on April 4th, 2013 and was expected to be completed in 18 month. Turkish Embassy was represented at the foundation stone-laying ceremony of the mosque. The religious advisor at the Embassy, Dr. Mustafa Ünver (who is also the president of HDV) attended the ceremony.

The fundraising campaign for the mosque is still quite active. The website of the mosque has an "online donations" page. There is also a "Piggy Bank" program, through which individuals can request a piggy bank from the mosque administration to collect money for the mosque.

[30] It should be mentioned that two of these three HDV mosques were not in the sample list. We found these articles about them while searching for the HDV mosques that were in the sample list of 39 Dutch Islamic Institutions.

7.5.4. In sum

Majority of the Turkish mosques in the Netherlands are associated with HDV. Particularly, HDV appoints and retains the imams at these mosques, provides advice and guidance in mosque construction and management. However, there is little publicly accessible online information on HDV's (as well as the other Turkish government agencies') financial support to the Turkish religious institutions in the Netherlands. Moreover, most of the available and. to our study relevant, information is difficult to verify with other reliable sources.

7.6. United Arab Emirates

The United Arab Emirates (UAE) represents one of the youngest states on the international stage, having been established only between December 1971 and February 1972 as a federation of seven emirates which were previously under British tutelage in the so-called Trucial States (Al-Suwaidi 2011). Despite its recent formation, the UAE has already emerged on the world stage as a leading economic powerhouse thanks to its economic management and vast oil reserves, which account for almost 10 per cent of the world's proven oil reserves (Davidson 2006). Economically speaking, the UAE represents a textbook case of 'rentier state' whose development relied on a combination of natural resources revenues, neo-patrimonial redistributing policies, strategic alliances with oil-buying partners and the employment of a legitimising discourse underpinned by traditional markers of identity connected to both tribalism and Islam (Al-Suwaidi 2011). However, throughout the years, thanks to the adoption of policies encouraging trade, economic development and global partnerships, the UAE has managed to significantly diversify its economy leading to a dwindling reliance on the oil and gas sector (Al-Suwaidi 2011). This has proven particularly important to ensure compliance with the existing social contract, especially in light of the near exhaustion of available natural resources outside of the Emirate of Abu Dhabi (Al Sayegh 2004).

Rapidly increasing standards of living and increased political stability have granted the UAE leadership an exceptionally high degree of legitimacy, despite the mostly autocratic nature of its political system (Christie 2010). From an institutional point of view, the UAE is structured in a federal system headed by a president. The work of the president, traditionally a member of the Abu Dhabi ruling family, is assisted by the Higher Council that is composed of the rulers of all the country's emirates. At the federal level, the Cabinet is responsible for the administration of armed forces, foreign and monetary policies. Furthermore, Emirati citizens are represented by 40 deputies at the Federal National Council (FNC), a body that maintains a purely consultative function. Deputies at the FNC hail from all of the country's emirates according to fixed quotas and were initially appointed in their entirety by the emirates' ruling elites. Currently, due to a process of gradual reforms, 20 deputies are appointed by rulers and the remaining 20 are elected by the Emirati population. Initial electoral consultations were conducted with a limited suffrage and the first FNC elections completely open to all Emirati citizens are set to take place only in 2019 (Al-Suwaidi 2011, Davidson 2006).

The UAE has a relatively small population of approximately four million people (Al-Suwaidi 2011). However, Emirati nationals account only for about 20 per cent of it, whereas the vast majority is composed of expatriate workers. Furthermore, as a reflection of the country's economic boom, the size of

the UAE population has developed very quickly if we consider that up until 1975 it comprised only 550,000 individuals (Al-Suwaidi 2011). Among the country's leadership, this situation has raised concerns of overt reliance on external expertise and vulnerability to undesired external influences (Al-Suwaidi 2011, Davidson 2014). As a consequence the UAE has been encouraging since the last decade a policy of emiratisation of the workforce, although some have argued that hosting large expatriate communities has actually proven to be a stabilising factor, rather than a reason of concern (Davidson 2014). This policy is well reflected and embraced by bodies reviewed for the purpose of this study (see Appendix B).

7.6.1. Islam in the United Arab Emirates

Emirati tribes have traditionally subscribed to the Sunni Maliki School of Islamic jurisprudence which is now commended as the official school of Islamic law throughout the country (GAIAE 2014b). No substantial indigenous religious minorities are present in the country. Throughout the years, the Emirati state has adopted a strongly regulating and centralising stance towards religious affairs. The General Authority of Islamic Affairs and Endowments (see Appendix B) oversees and regulates the establishment of mosques and Islamic centres within the country; furthermore the authority provides a number of centralised services including: Fatwa service in three languages, training for preachers, preparation of thematic guidelines for Friday sermons as well as monitoring of sermons delivered. Nonetheless, in light of the above described composition of the country's population it is not possible to exclude the presence of imported alternative strands of Sunni Islam. In particular, it is worth underlining the important role ascribed by scholars to small circles of preachers, scholars and students in the propagation of more scripturalist and somehow elitist interpretations of Islam, for example the so called Salafi current (Roel 2009).

As part of its foreign policy predicated upon humanitarianism and development, and thanks to its economic wealth, the UAE has become one of the world largest aid donors, meeting and exceeding the United Nations set target for high income countries of donating the equivalent of 0.7 per cent of the GDP each year (Kechichian 1998). A summary of institutions, bodies, and charities reviewed for the UAE due to their involvement in Islamic affairs or foreign aid disbursement can be found in Table 7.6.

Table 7.6: Overview of UAE institutions reviewed and sources available.

Body	Website	Annual Reports	Periodic Publications	Other Publications
Ministry of Social Affairs	✓	✓	✓	✓
Ministry of International Cooperation and Development (MICAD)	✓	✓	✓	✓
General Authority for Islamic affairs and Endowments	✓	×	✓	✓
Islamic Affairs & Charitable Activities Department (IACAD)	✓	×	✓	✓
International Humanitarian City	✓	✓	×	×

Body	Website	Annual Reports	Periodic Publications	Other Publications
Zakat Fund	✓	✓	×	×
Mohamed bin Rashid Charitable Humanitarian Foundation	×	×	×	×
Al Maktoum Foundation	✓	×	✓	✓
Emirates Red Crescent	✓	×	×	✓
Dar al-Ber Society	✓	×	×	✓
Dubai Charity Association	✓	×	×	✓
Beit Al Khair Society	✓	×	✓	×
Al-Shifa Charity Establishment	×	×	×	×
Dubai Islamic Bank Humanitarian Foundation	×	×	×	×
Dubai Foundation for Women and Children	✓	✓	×	✓
Khalaf Ahmad al-Habtoor Foundation	×	×	×	×
Jam'ia Al Islah Wa Al Taujih Al Ijtimahi - Relief Agency	✓	×	✓	×
Easa Saleh Al Gurg Charity Foundation	×	×	×	×
Al Barakah Charitable Society	×	×	×	×
Mohammad Omar Bin Haider Charity Establishment	×	×	×	×
Noor Dubai Foundation	✓	✓	×	✓
Dubai Cares	✓	✓	×	×
Emirates Airline Foundation	✓	×	×	×
Trahim Foundation	×	×	×	×
Majid al-Futtaim Charity Foundation	✓	×	×	×
Zayed Bin Sultan Al-Nahayan Charitable and Humanitarian Foundation	✓	×	×	✓
Khalifa Bin Zayed Al Nahyan Foundation	✓	✓	×	×
Ewa'a Shelters for Women and Children	✓	×	×	×
Ras Al Khaimah Charity Association	×	×	×	×
Al Rahma Charity	✓	×	✓	✓

Body	Website	Annual Reports	Periodic Publications	Other Publications
Foundation of Saqr Mohammed Al Qasimi For Charity	✓	×	×	×
Humaid bin Rashid Al Nouimi Foundation	✓	×	×	✓
Human Appeal International	✓	✓	×	✓
Al Ihsan Charity Association	✓	×	×	×
Sharjah Charity House	✓	✓	✓	×
Sharjah Charity International	✓	×	×	×
Fujarah Welfare Association	✓	×	×	×
Umm Al Quwain Charity Association	×	×	×	×

7.6.2. Public sector institutions relevant to our study

An extensive review of all the institutions, bodies and organisations identified in the UAE and listed in Table 7.6 produced a limited amount of information relevant to the scope of this study. On the one hand, it was possible to identify organisational websites, annual reports and periodic publications for a significant number of institutions reviewed. On the other hand, websites, annual reports and publications are marred by a paucity of details regarding projects undertaken, their recipients, countries of work, and, in a few cases, even the thematic area of intervention. In particular, most annual reports contain generic information concerning the volume of activities undertaken (e.g. number of mosques built, number of preachers sponsored, etc.) and donations received, without providing any further detail on budget allocation. The following section contains a brief overview of the most significant findings relating to the scope of this study. For an extended review of all institutions and organisations identified, as well as of the laws underpinning them and regulating their work, please refer to Appendix B.

Ministry of International Cooperation and Development

One of the state bodies identified and reviewed for the UAE is the Ministry of International Cooperation and Development (MICAD) which was established in March 2013 and replaced the Office for the Coordination of Foreign Aid (OCFA) established in 2008 (MICAD 2014b, The International Programme of the Charity Commission 2014). The MICAD's mission is to enhance the UAE's regional and international profile in the fields of international development and aid disbursement. To achieve this goal and to maximise the impact of the country's foreign assistance, the MICAD oversees and coordinates the country's foreign-aid strategy in accordance with core values of transparency, accountability, excellence, creativity, and commitment (MICAD 2014a).

A review of MICAD's and OCFA's annual reports highlighted several points relevant to the scope of this study. According to the 2009 OCFA annual report, the Netherlands were a recipient of aid coming from the UAE of AED 1,989,371. The entirety of this aid was disbursed by the Al Maktoum Foundation, making the Netherlands the third largest European recipient of aid from this foundation in that year after

Ireland and the United Kingdom. Although no further details are available in the report as to the sector or projects to which these funds were destined, it is specified that they were mostly employed for 'social infrastructures projects' (OCFA 2010, 47, 48). The OCFA annual report for 2010 indicates that although Europe as a whole was the recipient of funds coming from the UAE of approximately AED 124,767,927, no aid was destined to the Netherlands by any of the monitored organisations, bodies and groups (OCFA 2011, 105, 106). The 2011 OCFA report indicates that the Netherlands were the recipient of aid worth AED 1,167,581. The entirety of this fund was again provided by the Al Maktoum Foundation for projects listed as part of the 'Charity' category (see above). The report further adds that during the year 2011 the Al Maktoum Foundation launched the Essalam Mosque in Rotterdam which was believed to be the largest in Western Europe and 'offers space for 2,200 worshipper and aims to spread the teachings of Islam, with an emphasis on tolerance' (OCFA 2012, 78-79, 104-113). Lastly, the 2012 MICAD annual report indicated the Netherlands as a recipient of aid in the 'Charity' category for AED 1,977,682 which was once again fully provided by the Al Maktoum Foundation. These funds were reportedly destined to cover the core budget, as well as other projects (e.g. Iftar meals and support for individuals wishing to go on the Hajj pilgrimage) of the Essalam Mosque in Rotterdam (MICAD 2013, 108-109, 160-171).

Al Maktoum Foundation

The Al Maktoum Foundation was established in 2007 by HH Sheikh Mohammed Bin Rashid Al Maktoum and is one of the charities registered through the Islamic Affairs & Charitable Activities Department (IACAD; See Appendix B) (IACAD 2014, MBRF Foundation 2014). According to the organisation website, the Al Maktoum Foundation is mostly concerned with knowledge dissemination and advancement, particularly within the UAE and surrounding Middle Eastern region. Even though information about the financing of the Essalam Mosque in Rotterdam by the Al Maktoum Foundation is available through the MICAD website, no further relevant information on this or other mosque and Islamic centres building projects could be identified through the organisation's website.

7.6.3. Information on sample institutions

With regards to Emirati bodies and Dutch institutions selected, the research team found that most searches yielded very few results, which often did not pertain to the scope of this study. In one instance, it was possible to identify multiple news reports describing a clear funding link that helped establish a mosque located in one of the Netherlands' largest cities thanks to funds coming from an Emirati charity organisation registered in Dubai. In another instance, funding links between an Emirati charity and a mosque in Amsterdam were reported in a news item published by an Emirati Ministry. However, the mosque receiving funds in this case was actually not included in our original sample list.

7.6.4. In sum

Through its Ministry of International Cooperation and Development, the UAE appears to have set up a thorough mechanism for monitoring flows of aid and charitable activities stemming from the country and aimed at supporting third countries or communities located within them (for further details see Annex B). However, publicly available information accessible through the MICAD's website, annual reports and online publications is marred by a significant paucity of details. As a result, this allowed the research team

to obtain only a vague understanding of charitable work and funding emanating from the UAE and directed abroad in general and to the Netherlands in particular.

Although, to comply with Emirati law individual charities must keep a detailed record of all activities and donations made and received, this information is often not available through annual reports and other publicly released documents. Furthermore, even when annual reports are published on a charity's website, they often lack details as to how funds destined abroad have been employed other than for a reference to broad thematic areas of work. It therefore does not come as a surprise that, with regards to our sample lists of institutions, it was only possible to identify one connection between a Dutch Islamic institution and an Emirati charity, and even in this case the information was characterised by a paucity of details as to how funds were ultimately employed.

7.7. Conclusion on information collected from source countries

In general, in the source countries' region, there appears to be a general lack of transparency with regards to the expenditure of donor or funding agencies active in the field of humanitarian relief and charitable work. Few regulations or laws appear to govern donations to other countries. On the other hand, existing laws and regulations concerning the establishment and management of charities and foundations within two source countries reviewed (i.e. Saudi Arabia or UAE) should allow local state institutions to have a clear picture of sources of funding and recipients of programmes of state-licensed charities, foundations and organisations. Lastly, the attendance of representatives from source countries embassies and consulates to some launching events and inaugurations, documented by media outlets, seems to suggest that source countries diplomatic missions might have a more comprehensive picture of activities and funding emanating from state-registered charities and organisations than the one immediately available through publicly available annual reports.

Sources suggest that there is an active policy of funding to religious activities abroad in the majority of source countries selected for this study. This makes it conceivable that funding to Islamic institutions in Western Europe exists. However, our review of source countries charities and foundations seems to indicate that countries with a significant Muslim population in Asia and Africa are prioritised both in terms of volume of funds disbursed and number of programmes run. Only with a small number of exceptions, could funding to Islamic institutions based in the Netherlands not be cross-verified with publicly available information in source countries.

8. Synthesis and conclusions

In this final chapter, we aim to synthesise the findings through a review of the research questions. In addition, we will formulate recommendations on how to obtain a (more) complete and accurate overview of foreign funding to religious institutions in the Netherlands. Before we address the research questions however, a few cross-cutting observations will be made to put the difficulties of conducting this type of study into context.

8.1. Cross-cutting observations

There are a number of general, cross-cutting observations that can be made on the study. Despite having offered anonymity to key informants and assurance that data would be treated confidentially, several organisations and individuals appeared hesitant to contribute to this feasibility study. This may have been due to sensitivity of the topic and the polarised nature of the debates surrounding it. Another potential reason for this hesitance might be related to the privacy sensitive nature of data. Some information, e.g. those related to account transactions, is simply confidential. Finally, institutions and their staff may also simply lack the capacity or the priority to contribute to research efforts such as this one.

For these and possibly other reasons, we have been unable to collect data from public sector institutions and sources that we deemed potentially relevant for the purpose of this study. Access to police records, for instance, was not granted within the timescale of this study, despite having applied for access immediately after inception. The limited data availability has complicated this assessment. Notwithstanding these complications, we summarise the key findings and conclusions below by answering the research questions formulated for this study.

8.2. Answering research questions

In order to systematically address the research questions, we will summarize the conclusions through groupings of the research questions under several headings which reflect the driving topics of this study.

Table 8.1: Clusters of research questions by topic

Topic	Research questions
Other religions	7) How does the funding landscape of Islamic institutions in the Netherlands compare with that of comparable institutions in other religions?
Size and scope of funding	2) What information is available in the Netherlands about the nature and size of funding of Islamic institutions by foreign state actors (inc. Zakat funds) and types of funders? 5) Based on the available information, is it possible to approximate the size and scope of the identified foreign funding by foreign state actors? If so, what would be a preliminary estimate? 8) What is the reliability of the estimates of the nature and size of foreign funding of Islamic institutions in the Netherlands and the conditions under which the funding is provided? a) To what extent is the collected information exhaustive? b) Is there any reason to think it may create a biased picture of the situation? c) How reliable and how valid is the available data? Would it be possible to confirm the accuracy of the data, for example through triangulation of the identified sources in the Netherlands and those in the financing states? 9) To what extent do the results of the feasibility study offer the prospect of a more precise and reliable examination the size and nature, if additional sources were to be used?
Conditions of Funding	6) What do we know about the nature of the identified foreign financing and, if applicable, under which conditions the funding is provided? 8) What is the quality of the estimates of the nature and size of foreign funding of Islamic institutions in the Netherlands and the conditions under which the funding is provided? a) To what extent is the collected information exhaustive? b) Is there any reason to think it may create a biased picture of the situation? c) How reliable and how valid is the available data? Would it be possible to confirm the accuracy of the data, for example through triangulation of the identified sources in the Netherlands and those in the financing states? 9) To what extent do the results of the feasibility study offer the prospect of a more precise and reliable examination the size and nature, if additional sources were to be used?
Source countries	1) Which five countries can reasonably be expected to be the major financiers of Islamic institutions in the Netherlands? 3) What information is available in the five selected source countries about the size and scope of the funding to Islamic institutions in the Netherlands 4) Is it possible to trace specific examples of foreign funding of Dutch Islamic institutions in both the source country and in the Netherlands, and thus, to what extent are these sources mutually supportive?
Recommendations	10) What would need to be done to gain a (more) complete and accurate overview of foreign funding to religious institutions in the Netherlands?

8.3. Other religions

8.3.1. How does the funding landscape of Islamic institutions in the Netherlands compare with that of comparable institutions in other religions?

Islam is not the only religion with strong philanthropic traditions. Faith-based philanthropy (*Zakat* for Muslims) plays an important role in other religions such as Hinduism (*Daan* or *Seva*) and Christianity (giving of *alms*). However, Western countries have historically been a source, rather than a recipient, of faith-based foreign donations. Estimates confirm that the large majority of worldwide Diaspora remittances to families and communities in their countries of origin went to developing countries. Funding to religious (non-Muslim) Diasporas in Western countries does not appear to occur regularly. We have identified little evidence of funding from state actors abroad to other religious communities in Western countries. We also did not identify any indications of an institution-funding mechanism. This suggests that the existence of funding from foreign state actors to religious institutions in the West may be unique to Islam vis-à-vis other religions. Given the historical context and legal organisation of these institutions in the Netherlands, foreign funding is practically inevitable. Moreover, in contrast to other religions, the potential source countries tend to be relatively resource-rich with high GDP per capita.

8.4. Size and scope of funding

One of the most central elements of this study has been the assessment of the feasibility of a comprehensive study into the size and scope of foreign funding of religious institutions in the Netherlands on the basis of publicly available information. In short, we have tried to assess what kind of knowledge and evidence on foreign financing can be derived from public information. We have done this through an exploration of public sources of data using two samples, one random and one purposive, which contained in total 39 institutions, 2 of which are higher education institutions. In turn, we have assessed the likelihood that a full study, with additional resources would be able to generate answers to all the research questions.

The analysis of the size and scope of funding has been driven by four out of the ten original research questions. In order to precisely answer the research questions we will present our conclusions for each in turn.

8.4.1. Available information (Research question 2)

The information available can largely be divided into four groups: literature, data from public authorities, data from confidential sources, and additional online material (e.g. media, annual reports). From the literature it is known that official links exist between mosques in the Netherlands and foreign governments (e.g. Diyanet) or international organisations (e.g. Milli Görüş) (See Chapter 3). The literature we reviewed however, does not provide any indication of the possible size and scope of the funding provided through these channels.

In several cases, the links to foreign funding of Islamic institutions in the Netherlands that have been identified through the literature and online material could be confirmed by data from public institutions

and from confidential sources. To assess the type of information that is publicly available in the Netherlands, we contacted a number of public authorities in the Netherlands with requests for information, and in addition searched online databases. Table 8.2 provides an overview of the data from public authorities and online material and indicates if any information on the scope and size of funding can be derived from each of it. Confidential information included an intelligence report from the FIU and a correspondence between one of source country the Embassies in the Netherlands and the Ministry of Foreign Affairs.

Table 8.2: Overview of data from public authorities and online material

Data source	Data available?	With regards to religious institutions, does it provide…	
		Indications of foreign funding?	Figures of foreign funding?
Land Registry (*Kadaster*)	Yes	Yes: through mortgages	No
Annual reports	Yes, but only for a few institutions	No	No
Customs: cash transfer	Yes	No	No
Permits from municipalities	Yes	Yes	Yes, in one instance
Police	Not made available within the study's timescale	Not available	Not available
Prosecutor files	Not analysed		
Court cases – (Rechtspraak.nl)	Yes	Yes	No
General web searches	Yes	Yes	No
Diplomatic sources	No, but we were made aware of correspondence between Ministry of Foreign Affairs and one source country embassy	Yes	No, only in one specific case an amount was mentioned
Intelligence reports	Yes, one FIU report was reviewed after signing an NDA	Yes	Yes, in some cases

As was noted in Chapter 2 and 5, access to police records was not offered within the timescale of the project. With more time and resources available in a full study however, it is more likely that this type of information would be available.

8.4.2. Estimate of the size and scope of foreign funding (Research question 5)

While the data from the public authorities can be used to validate indications from the literature or the media that for particular religious institutions there has been foreign financing, the data do not generally allow an assessment of the size of foreign funding. The data only enable us to verify individual cases for which there are indications for foreign financing. In such cases, the initial indication from a media report can for example be verified with the use of data from the Land Registry that records a mortgage in the name of a foreign national, and from the Chamber of Commerce that shows various foreign nationals on the governance board of the institution. Still, such individual verifications are unlikely to be an effective way to identify or scope the broader environment. Nor do such individual cases provide a solid basis for estimates.

In general, caution is required when trying to extrapolate the findings beyond the samples. For the majority of the data sources a disproportionally large share of the findings derived from the institutions in the purposive sample. The institutions of the random sample appear to feature in media reports or court cases to a much lesser extent. In addition, the institutions from the random sample record fewer international board members and none of the institutions from the random sample lists a mortgage with a foreign owner, as compared to two such institutions in the purposive sample. This is not surprising as the institutions in the purposive sample represent a biased selection of mosques and higher education institutions. But the differences in the findings between the two samples clearly suggest that those mosques that, for instance, regularly feature in the news are not representative for the entire population of Islamic institutions in the Netherlands.

8.4.3. Quality of the data (Research question 8)

One of the reasons for the difficulty of deriving solid conclusions from the available evidence is the rather diverse data quality. Information received from the public authorities tends to be reliable, as it represents all the information that is (legally and publicly) available on an institution. However, for the two samples the data is not always complete.

The completeness of information available from mosques however, is substantially lower. As annual reports from religious institutions are not frequently made publicly available, there is little transparency of the financial status, income or expenditure of these religious institutions. Of the 39 institutions in the combined random and purposive sample, we only found one annual report, which however, did not provide information about donations, for instance. The changes in the regulation pertaining to PBO (ANBI) are unlikely to increase the quality of the data available through annual reports for several reasons. First, religious institutions are exempt from various reporting requirements on finances until 1 January 2016. Secondly, the majority of Islamic institutions is not registered as ANBI. Finally, those ANBIs that receive funding from abroad will be unlikely to benefit from ANBI status as the tax exemption applies only to donations from Dutch tax payers.

In case a comprehensive assessment of the size and scope of foreign funding would be conducted, it seems that rather than just improving the quality of the current public data, it will be necessary to access additional data that is not publicly available. Intelligence information as well as data from banks on account transactions can potentially provide more insight into the financial flows to religious institutions in the Netherlands. Such intelligence information, however, is not available to (research) institutions without a special investigation mandate. Moreover, even for intelligence agencies it will likely be difficult to obtain account transaction data for a large sample of institutions without any specific suspicion of illegal or harmful activities.

8.4.4. Prospects for a more elaborate study with additional sources (Research question 9)

There appear to be three ways in which this study can be expanded. First, rather than for a selection of religious institutions, data is collected for all known Islamic institutions in the Netherlands from the sources used in this study. This would imply that the number of sources will remain the same, yet the

amount of data collected from them covers the entire population of Islamic institutions. While this would provide a lot of additional information, it is unlikely that such an expansion would generate many new insights. Furthermore, this expansion is not likely to provide information on the basis of which a reliable estimate of the scope and size of foreign financing can be made.

The second option is to expand the study by adding data sources to the existing data sources. As mentioned in the previous section, however, this would mean including non-public data sources. While changing the nature of the study, inclusion of such sources could potentially provide more insights into foreign financing. However, it is unlikely to simply 'reveal' all foreign financing since it is known from the literature that money flows can be difficult to trace and since access to financial information is not straightforward.

Thirdly, it would be possible to investigate each individual institution in more detail and follow potential links through. For instance, we have not queried the affiliations of all board members known from the KvK records. These affiliations might in individual cases reveal information about (alleged) links to (international/intermediary) organisations that are thought to be involved in financing Islamic institutions in Western Europe. However, aside from the resource-intensiveness of such an exercise, it tends to be difficult to verify these links when relying on information available in the public domain. Hence, it would require the capabilities and mandate of special investigative (intelligence) agencies.

8.5. Influence of funding on Islamic institutions

While the size and scope of foreign funding has been one of the major topics of interest in this study, the research questions also urge us to assess whether the public data can be informative about any conditions that might be attached to such funding. Some media reports and discussions in Parliament (see Chapter 1 and 2) suggest that conditions might apply to foreign financing to Islamic institutions, possibly leading to actions or activities that are illegal or in conflict with democratic values. It is important, however, to recognise that foreign financing in itself need not be problematic, nor is influence by nature problematic, as is also outlined by recent RMO (2014) advice. The questions therefore only seek to understand if information sources available to us can uncover anything about possible conditions related to foreign financing.

In this study we have relied primarily on indirect proxies to providing potential indications of conditions to foreign funding. The only way to address this is through an examination of the possible outcomes or manifestations of such conditions and influence. The outcomes or manifestations we have examined were based on data sources listed in Table 8.3.

Table 8.3: Overview of data from public authorities on influence

Data source	How would influence be identified?	Do the data provide insights into influence or conditional funding?
Land Registry (*Kadaster*)	Ownership and mortgage arrangements	No
Chamber of Commerce	Board membership	Yes, but only marginally
Police and prosecutor records (*not available*)	(suspected) crimes, offences or wrongful acts attributed to funding	Not available
Court cases	(suspected) crimes, offences or wrongful acts attributed to funding	No, with some exceptions

8.5.1. Conditions under which funding is provided (Research question 6)

On the basis of the public sources reviewed it is not possible to derive any generalizable conclusion about possible conditions under which financing is provided to Islamic institutions in the Netherlands. Through the analysis of the various data sources there appears only one area in which a known instance of potential influence can be verified and that is at the governance level. It is known from the literature, media reports, and intelligence information that, in some cases, umbrella organisations and foreign funders have appointed foreign board members at the institutions funded. The examination of the data from the Chamber of Commerce showed for certain institutions with a confirmed foreign funder that there were also foreign board members from the same country. This could be taken as an indication that the funder may have some influence on the management of or practices at these institutions. Yet caution is again required, as nothing is known about the nature of these arrangements or the role of the foreign board member. Furthermore, the random sample showed that the number of board members with foreign nationality was very low at less than 1 per cent.

The other data sources reviewed, such as court cases, provided no real insights into funding conditions or influence. Beyond confirming arrangements that were already reported in the media and could signal influence, no new insights into conditional funding or influence are derived from the examination of the public data sources for the institutions in our two samples. Finally, it is worth noting that even if "undesired" behaviour or activities can be associated to Islamic institutions and even if this coincides with foreign funding, it is highly difficult to establish a causal relationship between them, as was also outlined by the RMO (2014).

8.5.2. Quality of the data (Research question 8)

While information received from the public authorities tends to be reliable, it does not allow us to draw any substantial conclusion on the possible conditions that are attached to the foreign funding of mosques in the Netherlands. The public sector data consulted are not construed to reveal anything about conditions to financing or influence. Attempts to further improve the quality of the current data are therefore unlikely to increase the possibility to generate insights into any conditions attached to funding.

8.5.3. Prospects for elaborate study with additional sources (Research question 9)

It is unlikely that with additional public sources a more precise and reliable examination could be made of the possible conditions attached to foreign funding. While expanding the study from the sample institutions to all known Islamic institutions would increase the accuracy of the assessment of for example foreign board members, this is unlikely to yield any additional insights into the nature of these arrangements.

Other sources of data would be required to gain insight into the conditions of funding. However, such sources are difficult to access and would require in-depth information about the workings of particular institutions that have received foreign funding. It might be possible to investigate each individual institution in more detail to map the links between different stakeholders, institutions, individuals and their actions. However, it will be difficult to complete the picture for each of the institutions, particularly if this information would have to be retrieved from the public domain.

One source of information we have not been able to assess would be self-reported data from the sector itself. Whilst there are typically caveats associated with self-reported data, particularly on contentious subjects, surveying or interviewing members of mosques or their umbrella organisations might be the only feasible approach to retrieve information in a systematic and consistent fashion.

8.6. Source countries

We have systematically reviewed the information available from public sources in source countries by conducting search engine queries in Arabic and Turkish as well as scanning the documentation available from public sector institutions and NGOs affiliated with state actors.

8.6.1. Six source countries (Research question 1)

The source countries included in this study were selected on the basis of three criteria: the size of their Diaspora in the Netherlands (Turkey and Morocco), countries mentioned in a 2009 letter from the Dutch Ministry of Interior (Saudi Arabia, UAE and Turkey, and Morocco), and an initial review of international publicly available information and experts (Qatar, Kuwait, UAE and Saudi Arabia). As there was no strong reason to drop any of the countries mentioned above, we decided to analyse six countries.

The information uncovered as part of this feasibility study did not reveal any evidence of foreign funding from countries other than those listed above. Whilst there is no reason to believe that other countries are involved in funding Islamic institutions in the Netherlands, it cannot be ruled out either.

8.6.2. Information on size and scope of foreign financing from source countries (Research question 3) and verification of funding from source countries (Research question 4)

International literature and documentation available from source countries do reveal indications of funding channelled from Saudi Arabia and other Gulf States through state institutions, such as the Saudi Ministry of Islamic Affairs, endowments, Da'wah and Guidance, and state-registered charities, as reported by the Emirati Ministry of International Cooperation and Development, and by internationally active

organisations such as the Muslim World League and the International Islamic Relief Organization (both based in Saudi Arabia). Grey literature indicates also the existence of funds being channelled from source countries through private individuals and other informal groups (e.g. transnational Salafi networks).

Only for few exceptions funding to Dutch Islamic institutions could not be cross-verified in source countries from the online sources consulted. Moreover, as mentioned above, sources suggest that there is an active policy of funding to religious activities abroad in the majority of source countries selected for this study. This makes it conceivable that funding to Islamic institutions in Western Europe exists although our review of source countries charities and foundations seems to indicate that countries with a significant Muslim population in Asia and Africa are prioritised both in terms of volume of funds disbursed and number of programmes run.

However, in general, in the source countries' region, there appears to be a general lack of transparency with regards to the expenditure of donor or funding agencies active in the field of humanitarian relief and charitable work. Few regulations or laws appear to govern donations to other countries. On the other hand, existing laws and regulations concerning the establishment and management of charities and foundations within two of the source countries reviewed (i.e. Saudi Arabia or UAE) should allow local state institutions to have a clear picture of sources of funding and recipients of programmes of state-licensed charities, foundations and organisations. Lastly, the attendance of representatives from source countries embassies and consulates to some launching events and inaugurations, documented by media outlets, seems to suggest that source countries diplomatic missions might have a more comprehensive picture of activities and funding emanating from state-registered charities and organisations than the one immediately available through publicly available annual reports.

8.7. Final thoughts and recommendations

We end this study with a few final thoughts and recommendations as to how this study can and cannot be expanded to more directly and accurately answer the research questions posed above.

8.7.1. Intelligence and bank transfer data

While a study could theoretically be expanded with intelligence and bank transfer data, we do not recommend embarking on a comprehensive analysis of all such data. The level of information sharing that can be achieved remains governed by privacy laws and the legal requirements of the financial services industry.

It needs to be remembered that foreign financing and associated potential influence is not a priori undesirable or illegal. First, it can be difficult for mosques to obtain funding from within the community for sizeable investments such as construction projects. Thus, foreign sources are likely options for financing (see Chapter 1). Second, and more fundamental, under the principle of reciprocity, as outlined recently by the RMO, it would be inappropriate to label foreign financing to Islamic institutions in the Netherlands as 'undesirable' as currently Dutch governmental funding is also provided to institutions abroad (RMO 2014). Third, assessing the legal nature of (financial) intelligence information is beyond the scope of this study, but it should be noted that collecting intelligence information on the entire

population of Islamic institutions may not be pertinent unless there a clear suspicion of irregularities. There is a trade-off between the privacy rights of these institutions and the added value of gaining a comprehensive overview of foreign funding. The material and immaterial costs of such an invasive and resource-intensive approach should not be disproportionate to its potential benefits. Even for an institution with a special investigative mandate, such as an intelligence agency, it will be practically and legally problematic to conduct such a comprehensive assessment of Islamic institutions.

However, developing this relationship between the banking and public sector and investigating the extent to which it could legally be used to provide greater insight for the government into the financial flows from source countries to religious institutions in the Netherlands should be considered.

8.7.2. Expanding the sample of public data

In contrast to the non-public data sources, a viable option to expand the study could be to systematically collect public information on the majority or all known Islamic institutions rather than on a sample. This would of course provide a lot more data points, yet, as noted in the previous sections, it is not expected that a reliable and accurate assessment of the size and scope of funding could be made on the basis of these data. However, it would to some extent be possible to verify suggested links between Islamic institutions in the Netherlands and foreign actors on the basis of this data. For several instances, the public sector information allowed us to verify and confirm a number of suggested links between the Islamic sample institutions and foreign actors, for example through the analysis of data from the Land Registry and the Chamber of Commerce. Still, while this analysis can allow for the identification and verification of such links, it has been noted that the data do not provide insights into the nature of these links, and therefore cannot address the question of potential conditions attached to funding.

8.7.3. Focus on internationally operating intermediaries

Through the analysis of the public sector information on sample institutions, the review of the literature, intelligence and media reports, confidential information made available to us and through the interviews we were able to identify a number of internationally operating intermediary organisations which seem to be involved financing Islamic institutions in the Netherlands using funds abroad. While a systematic analysis of these intermediary organisations was outside the scope of this study, their potential role in the foreign financing of Islamic institutions makes them a matter of interest for further studies. Again, any funding through such intermediaries is not *a priori* problematic. Thus, a more thorough study of these organisations could increase the understanding of the landscape, activities and financial flows of international Islamic finance.

8.7.4. Facilitate improving financial transparency in the sector

There is little financial transparency among Islamic institutions and umbrella organisations in the Netherlands. Our recommendation would be to encourage these organisations to improve this transparency, avoiding any unnecessary invasive investigation of those institutions that have nothing to hide. Institutions and umbrella organisations should be encouraged to publish their annual report or share it with the government, presenting information about donations and other funding from abroad. The

Dutch government could play a role in this process by facilitating co-regulation or stimulating self-regulation, possibly in collaborating with umbrella organisations. Such self-reporting could be institutionalised through, for example, a national covenant, signed by individual institutions or their umbrella organisations.

Alternatively, regulation and monitoring of the charitable sector may be widened in combination with an obligation to report donation of amounts above a certain threshold from funders residing abroad.

Few jurisdictions require the automatic disclosure of foreign donations by charities. In Canada, however, regulation and monitoring of the charitable sector is undertaken by the Charities Directorate within the Canada Revenue Agency (see Chapter 3). As part of the annual filings required to maintain registration as a charity, donation sources are requested under certain circumstances. In particular, information about the donor organisation needs to be disclosed for gifts over CAD 10,000 involving donors that are not Canadian residents. The details of the name of the organisation, institution type, the value of the donation, and its purpose may be captured and kept confidential to the monitoring agency.

In the Netherlands, the recent changes in the reporting requirements for ANBIs oblige these charities to publish their annual reports in order to maintain ANBI status. However, the majority of Islamic institutions are not registered as ANBIs and have little incentives to do so. A filing requirement of donations from abroad could be extended to foundations and associations not registered as ANBIs. It would also be interesting to focus on those Islamic institutions that give up their ANBI status following the January 2016, when the exceptions for religious institutions will be lifted

Whilst it is unlikely that all institutions will comply with these approaches, it will help focus the efforts and resources on a small sample of non-transparent institutions and hence increase trust and transparency within the community of Islamic institutions as a whole.

References

Abbas, H. 2005. *Pakistan's Drift into Extremism: Allah, the Army, and America's War on Terror*. New York: M.E. Sharpe.

Addustour. 2014. '15 miliyun darahym liSunduq al-Zaka min mu'assasa Dubai al-Islamiyy al-Insaniyya' As of 6 November 2014: https://addustour.com/17270/15+%D9%85%D9%84%D9%8A%D9%88%D9%86+%D8%AF% D8%BI%D9%87%D9%85+D9%84%D8%B5%D9%86% D8%AF%D9%88% D9%82%++ D8%A7% D9%84% D8%B2%

AIVD (Algemene Inlichtingen- en Veiligheidsdienst). 2004. *Saoedische invloeden in Nederland, verbanden tussen salafitische missie, radicaliseringsprocessen en islamistisch terrorisme*. Den Haag: AIVD.

———. 2007. *Radicale dawa in verandering:De opkomst van islamitisch neoradicalisme in Nederland*. Den Haag: AIVD.

al-Arabiya. 2012. 'Mutalaba biIqrar tanzim mu'assasat al-Mujtama3 al-madaniyy al-su3udiyya'. As of 29 November 2014. http://www.alarabiya.net/articles/2012/09/04/236086.html

Al Ittihad. 2013. 'Itlaq Mu'assasa Khalf al-Habtour lila3mal al-khairiyya biDubai' As of 7 November 2014: http://www.alittihad.ae/details.php?id=8067&y=2013

Albasar International Foundation. 2012a. 'Campaigns, medical treatment (camp)' As of 29 November 2014: http://www.al-basar.com/site/en/activities

———. 2012b. 'Eye Hospitals'. As of 29 November 2014: http://www.al-basar.com/site/en/hospitals

———. 2012c. 'Future Projects'. As of 29 November 2014: http://www.al-basar.com/site/en/projects

———. 2012d. 'Vision and Mission'. As of 29 November 2014: http://www.al-basar.com/site/en/pages/645

———. 2012e. 'Who we are?'. As of 29 November 2014: http://www.al-basar.com/site/en/about

Al Bayan. 2011. Manah Tarkhis.As of 7 November 2014: http://www.albayan.ae/across-the-uae/news-and-reports/2011-04-12-1.1419590

———. 2012. As of 7 November 2014: http://www.albayan.ae/across-the-uae/2012-08-11-1.1706405 . 2014.

———. 2013. 'Itlaq Mu'assasa Khalf al-Habtour lila3mal al-khairiyya' As of 7 November 2014: http://www.albayan.ae/across-the-uae/news-and-reports/2013-01-22-1.1808356

———. 2014. ‘Su3ud bin Saqr iamnahu ardan tijariyyan li Ras al-Khaima al-Khairiyya’. As of 29 November 2014: http://www.albayan.ae/across-the-uae/news-and-reports/2014-09-22-1.2206733

al-būābah al-alaktrūnīah lidawlit al-kuwait. 2014. al-'aml al-khaīrī fi dawlit al-kuwait.As of 2 October 2014: http://www.e.gov.kw/sites/kgoArabic/portal/Pages/Information/Info_Charity.aspx

Aleslaah. 2011a. ‘al-ru’ia wa al-ahdaf’ As of 28 November 2014: http://www.aleslaah.net/site/page.php?id=20 Aleslaah. 2011b. ‘Manhaj al-da3ua’ As of 28 November 2014: http://www.aleslaah.net/site/page.php?id=21

Al Habtoor. 2014. ‘The Khalaf Ahmad Al Habtoor Foundation (KAHF) to Build a Mosque & Islamic Centre in Albania’. As of7 November 2014: http://www.habtoor.com/en/news/26/81/the-khalaf-ahmad-al-habtoor-foundation-kahf-to-build-a-mosque-islamic-centre-in-albania

Alhargan, Rael A. 2012. ‘Saudi Arabia: Civil Rights and Local Actors’ *Middle East Policy* 19(1): 126-139.

al-Iqtisadiyy. 2013. ‘Ras al-Khaima al-khairiyya bisadad tauzi3 ittifaqiyya liSiana al-mabaniyy al-qadima’ As of 29 November 2014: https://ae.aliqtisadi.com/4366-%D8%B1%D8%A3%D8%B3-%D8%A7%D9%84%D8%AE%D9%8A%D9%85%D8%A9-%D8%A7%D9%84%D8%AE%D9%8A%D8%B1%D9%8A%D8%A9-%D8%A8%D8%B5%D8%AF%D8%AF-%D8%AA%D9%88%D9%82%D9%8A%D8%B9-%D8%A7%D8%AA%D9%81%D8%A7%D9%82%D9%8A%D8%A9/

al-itihād al-'ālamī l'ūlama al-muslimīn. 2014. *wāsit al-istiqbāl al-hār wa al-mashā'ar al-jīāshah....* As of 1 October 2014: http://iumsonline.org/ar/default.asp?menuID=6&contentID=3511

Al Ihsan Charity Association. 2014. As of 6 November 2014: http://www.alihsan.ae/Portal/ar/about-us/about-us.aspx

Al Ittihad. 2010. ‘Muahamma bin Rashid iasdaru marusman biInsha’ mu’assasa 3isa Salih al-qarq al-khairiyya’ As of 7 November 2014: http://www.alittihad.ae/details.php?id=71983&y=2010

al-Khaleej. 2012. ‘Jam3ia Umm al-Quwain al-khairiyya tawazi3u 7 malaiyyn draham zaka maal’ As of 29 November 2014: http://www.alkhaleej.ae/alkhaleej/page/e117b0be-b931-4e3f-a8c6-8c43d1bddc47

———. 2014. ‘Khairiyya al-Shariqa tausi3u mashru3 Iftar sa’im liIashmala 54 daula’ As of http://www.alkhaleej.ae/alkhaleej/page/bd0c3324-815f-46e4-959b-681b3c08b3c8

al-majlis al-islāmī al-dānmarkī.n.d. *al-majlis al-islāmī al-dānmarkī*. As of 8 October 2014: https://www.facebook.com/media/set/?set=a.486268448103809.1073741826.252733358123987&type=3

al-mumlikah al-maghrebīah wazārit al-tashghrīl wa al-shūūn al-ijtimā'īah.n.d. ‘al-muhām’ employ.gov.ma. As of 11 October 2014: http://www.emploi.gov.ma/index.php/ar/departement-emploi-ar/attributions-2.html

Al-Quds. 2014. ‘Qatar ta3tazimu bana’ akbar masjid fi Urubba bi 3 miliarat dular’ As of 10 November 2014: http://www.alquds.co.uk/?p=187084

Al-Rasheed, Madawi. 2013. 'Saudi Arabia: local and regional challenges.' *Contemporary Arab Affairs* 6(1): 28-40.

Al Rahma. 2013a.'Bana' al-Masajid'. As of 29 November 2014: http://www.rahmah.ae/site/show_news.php?nid=9&cid=2

———. 2013b. 'Dalil Al Rhama'. As of 29 November 2014: http://www.rahmah.ae/site/show_news.php?nid=69&cid=16

———. 2013c. 'Injazatuna'. As of 6 November 2014: http://www.rahmah.ae/site/page.php?id=10

———. 2014a. 'Afra' al-Jam'ia'. As of 6 November 2014: http://www.rahmah.ae/site/page.php?id=6

———. 2014b. 'Id bil3ata''. As of 29 November 2014: http://www.rahmah.ae/site/book/br-book/index.html

Al-Riyadh. 2010. 'Insha' mu'assasa al-malik 3abd Allah bin al-3aziz al-3almiyya lila3mal al-khairiyya wa al-insaniyya' As of 29 November 2014: http://www.alriyadh.com/560361

Al-Riyadh. 2014. 'al-na'ib al-thani iadhsanu mashru3 mu'assasa khadim al-7aramain liri3aia mardha al-kula' As of 29 November 2014: http://www.alriyadh.com/900811

Al Sayegh, Fatma. 2004. 'Post-9/11 Changes I the Gulf: The Case of the UAE' *Middle East Policy* 11(2): 107-124.

Al-Saif, Tawqif. 2014. 'Political Islam in Saudi Arabia: recent trends and future prospects.' *Contemporary Arab Affairs* 7(39): 398-420.

Al Sayegh, Fatma. 2004. 'Post-9/11 Changes I the Gulf: The Case of the UAE.' *Middle East Policy* 11(2):107-124.

Al-Seyassah. 2014. 'al-ṣāni': al-wada' la yahtamil mukhālifāt al-jama'īāt...' 14 October 2014 As of 12 January 2015: http://al-seyassah.com/%D8%A3%D8%AD%D9%85%D8%AF-%D8%A7%D9%84%D8%B5%D8%A7%D9%86%D8%B9-%D9%84%D9%80-%D8%A7%D9%84%D8%B3%D9%8A%D8%A7%D8%B3%D8%A9-%D8%A7%D9%84%D9%88%D8%B6%D8%B9-%D9%84%D8%A7-%D9%8A%D8%AD%D8%AA%D9%85%D9%84/#sthash.sN5fKKDI.dpbs

Al-Sharq al-Awsat. 2010. 'al-malik 3abd Allah 3ala insha' mu'assasa khadim al-haramain al-3alamiyya lila3mal al-khairiyya wa al-insaniyya' As of 29 November 2014: http://classic.aawsat.com/details.asp?section=4&article=587279&issueno=11617#.VEDmOvldV8E

Al-Shorfa. 2014. 'Saudi Arabia tightens control on Zakat.' *Al-Shorfa,* 21 July. As of 29 November 2014: http://al-shorfa.com/en_GB/articles/meii/features/2014/07/21/feature-02

Al-Suwaidi, Abdulla. 2011. 'The United Arab Emirates at 40: A Balance Sheet' *Middle East Policy*18(4): 44-58.

Alwaleed Bin Talal Foundation. 2014a. 'About Us' As of 29 November 2014: http://www.alwaleedfoundations.org/saudi-arabia/about/

———. 2014b. 'Community Development Projects' As of 29 November 2014: http://www.alwaleedfoundations.org/global/category/community-development/?project

———. 'Focus Areas' As of 29 November 2014: http://www.alwaleedfoundations.org/focus-areas

———. 2014d. 'Global Cultural Understanding Projects' As of 29 November 2014: http://www.alwaleedfoundations.org/global/category/global-cultural-understanding/?project

———. 2014e. 'Women Empowerment Projects' As of 29 November 2014: http://www.alwaleedfoundations.org/global/category/womens-empowerment/?project

Al Watan. 2008. As of 29 November 2014: http://cci-ngoregnet.solutionsclient.co.uk/Library/English%20translation%20KSA%20NGO%20law%202008.doc

Amghar, S. 2007. *Political Islam in Morocco*. Brussels: Centre for European Policy Studies.

Anand, Priya. *Hindu Diaspora and Religious Philanthropy in the United States*. Paper read at International Society for Third Sector Research Sixth International Conference. Toronto, ON.

Anthias, F. 1998. Evaluating 'diaspora': Beyond ethnicity?. Sociology, 32(3): 557–580.

Arabs Today. 2014. '5 malaiyyn min mu'assasa Dubai al-Islamiyy ila Trahim al-Khairyya' *Arabs Today*, July 03. As of 7 November 2014: http://www.arabstoday.net/fugqb/5%20%D9%85%D9%84%D8%A7%D9%8A%D9%8A%D9%86%20%D9%85%D9%86%20%D9%85%D8%A4%D8%B3%D8%B3%D8%A9%20%D8%AF%D8%A8%D9%8A%20%D8%A7%D9%84%D8%A5%D8%B3%D9%84%D8%A7%D9%85%D9%8A%20%D8%A5%D9%84%D9%89%20%D8%AA%D8%B1%D8%A7%D8%AD%D9%85%20%D8%A7%D9%84%D8%AE%D9%8A%D8%B1%D9%8A%D8%A9.html

Armajani, Jon. 2012. *Modern Islamist Movement: Religion and Politics*. Hoboken: Blackwell Publishing Ltd.

Asscher, L. F. 2013. *Response of Minister of Social Affairs and Employment to 'Kamervraag/vragen van het lid Van Klaveren, De Roon en Wilders over de islamitische inmenging van Koeweit in Nederland.*' As of 16 February 2015: http://www.gemeenteloket.minszw.nl/binaries/content/documents/gemeenteloket/documenten/dossiers/werk-en-inkomen/integratie/kamerstukken/2013-09-12/kamervragen-islamitische-inmenging-van-Koeweit-in-Nederland

Associatif.ma. . 2014. marāhil tāsīs al-jama'īah. As of 11 October 2014: http://www.associatif.ma/2014/08/blog-post_87.html

Atia, Mona.2010. 'Islamic Approaches to Development: A case study of Zakat, Sadaqa and Qurd al Hassan in Contemporary Egypt', *8th International Conference on Islamic Economics and Finance*. As of 5 January 2015: http://www.iefpedia.com/english/wp-content/uploads/2011/12/Mona-Atia.pdf

Austrian Parliament. 2015. 'Bundesgesetz über die äußeren Rechtsverhältnisse islamischer Religionsgesellschaften (446 d. B.)' As of 29 January 2015: http://www.parlament.gv.at/PAKT/VHG/XXV/I/I_00446/index.shtml

Awasser. 2013. '7aula al-jam3ia' As of 29 November 2014: http://www.awasser.org.sa/index.php?page=vmo

baīt al-zakāh. 2014a. 'al-mashārī' al-inshāīah wa al-tanmuwīah'. As of 15 October 2014: http://www.zakathouse.org.kw/AxCMSwebLive/ar_projects_int_1.cms

———. 2014b. 'man nahnu'. As of 21 O tober 2014: http://www.zakathouse.org.kw/AxCMSwebLive/ar_about.cms

Bal, Rasit. Interviewed by authors, 2014.

BBC. 2014. 'Morocco profile: Leaders'. As of 10 November 2014: http://www.bbc.com/news/world-africa-14121440

Beit al-Khair. 2014a. 'Mu'assasa Dubai al-Islamiyy al-Insaniyya tatabarra3u…' As of 6 November 2014: http://beitalkhair.org/en/details.php?content=news&news=445

———. 'About Us'. As of 6 November 2014:http://beitalkhair.org/en/content.php?content=about-us

———. 2014c. 'Joint Cooperation. As of 6 November 2014:http://beitalkhair.org/joint-cooperation.php

———. 2014d. 'Magazine'. As of 6 November 2014:http://beitalkhair.org/magazine.php

———. 2014e. 'Tansiq baina bait al-khair wa khairiyya' As of 6 November 2014: http://beitalkhair.org/en/details.php?content=news&news=060514055349

———. 2014f. 'Projects'. As of 6 November 2014:http://beitalkhair.org/en/projects.php

Bekkers, B. & P. Wiepking. 2011. 'A Literature Review of Empirical Studies of Philanthrophy: Eight Mechanisms that Drive Charitable Giving' *Nonprofit and Voluntary Sector Quarterly* 40(5): 937-38.

Belastingdienst. 2014. 'Which conditions must be met by Public Benefit Organisations?'. As of 4 December 2014: ` http://www.belastingdienst.nl/wps/wcm/connect/bldcontenten/belastingdienst/business/other_subjects/public_benefit_organisations/conditions_pbos/which_conditions_must_be_met_by_pbo

Benthall, Jonathan. 2003. 'Humanitarianism and Islam after 11 September'. In *Monitoring Trends in Humanitarian Action: Humanitarian Action After September 11th* edited by J. Macrae and A. Harmer . London: Overseas Development Institute Humanitarian Policy Group.

Berkley Center for Religion, Peace & World Affairs. 2014 'Religious Freedom in Morocco'. As of 11 October 2014: http://berkleycenter.georgetown.edu/essays/religious-freedom-in-morocco

BTI (Bertelsmann Stiftung). 2014. *Kuwait Country Report*. Gütersloh: Bertelsmann Stiftung, 2014.

BusalahQa. 2013. *Twitter status*. As of 8 October 2014: https://twitter.com/BusalahQa/status/359342741798813696

———. 2014. *Twitter status*. As of 10 October 2014: https://twitter.com/BusalahQa/status/449967652002226176

Canada Revenue Agency. 2015. *Registered Charity Information Return*. Canada Revenue Agency. As of 15 February 2015:http://www.cra-arc.gc.ca/E/pbg/tf/t3010/t3010-14e.pdf

———. 2013. 'Charitable purposes' As of 15 February 2015: http://www.cra-arc.gc.ca/chrts-gvng/chrts/pplyng/mdl/menu-eng.html

———. 2011. 'Who we are' As of 15 February 2015: http://www.cra-arc.gc.ca/chrts-gvng/chrts/bt/mssn_vsn-eng.html

Capital Market Authority. 2014. 'About Capital Market Authority' As of http://www.cma.org.sa/En/AboutCMA/Pages/default.aspx

———. 2014. 'Anti-Money Laundering and Counter-Terrorist Financing Rules' As of http://www.cma.org.sa/En/Documents/AML%20%20amended%20Final.pdf

CBS (Central Bureau voor de Statistiek). 2009. *Religie aan het begin van de 21ste eeuw*. The Hague: CBS. As of 13 February 2015: http://www.cbs.nl/nl-NL/menu/themas/vrije-tijd-cultuur/publicaties/publicaties/archief/2009/2009-e16-pub.htm

Charity Commission. . 2008. *Draft Law for NGOs*. LOCATION: Charity Commission.

———. n.d. 'The Kingdom of Saudi arabia' As of http://cci-ngoregnet.solutionsclient.co.uk/country_information_by_region/Middle_East_and_North_Africa/KSA.asp

Chibli, Mallat. 2007. Introduction to Middle Eastern Law. Oxford: Oxford University Press.

Christie, Kenneth. 2010. Globalisation, Religion and State Formatin in the United Arab Emirates and Pakistan, Totalitarian Movements and Political Religions, vol 11(2), pp. 203-212.

CIA. 2014. 'Morocco'. in *The World Factbook*. Washington, D.C.: CIA. As of 11 October 2014:https://www.cia.gov/library/publications/the-world-factbook/geos/mo.html

Civicus. 2013. 'Civil Society Demands Legal Status in Saudi Arabia' As of 29 November 2014: http://www.civicus.org/index.php/en/media-centre-129/press-releases/1894-civil-society-demands-legal-status-in-saudi-arabia;

Congressional Research Service. 2007. 'Saudi Arabia: Terrorist Financing Issues' As of 29 November 2014: http://fas.org/sgp/crs/terror/RL32499.pdf

Cordesman, Anthony H. 2006. 'Saudi Arabia: Friend or Foe in the War on Terror?' *Middle East Policy* 13(1): 28-41.

Dar Al Ber Society. 2014a 'About Us'. As of 7 November 2014: http://www.daralber.ae/Arabic/About/Pages/default.aspx

———. 2014b.'Mashari3 Dar al-Ber' As of7 November 2014: http://www.daralber.ae/Arabic/Pages/alberproject.aspx

Dar al-Shifa'. 2014. 'Facebook page'. As of 28 November 2014:https://www.facebook.com/alshifadar

Davidson, Cristopher M. 2006. 'After Sheykh Zayed: The Politics of Succession in Abu Dhabi and the UAE' *Middle East Policy* 13(1): 42-59.

———. 2014. 'Expatriates and the Gulf Monarchies Politics, Security and the Arab Spring', *Asian Affairs*, 45(2), 270-288.

De Cordier, B. 2009. 'Faith-based aid, globalisation and the humanitarian frontline: an analysis of Western-based Muslim aid organisations'. *Disasters*, 33: 608–628.

De Haas, H. 2014. 'Morocco: Setting the Stage for Becoming a Migration Transition Country?' *Migration Policy Institute*. As of 11 October 2014:http://www.migrationpolicy.org/article/morocco-setting-stage-becoming-migration-transition-country

De Hart, J. 2014. *Geloven binnen en buiten verband - Godsdienstige ontwikkelingen in Nederland*. The Hague: Sociaal en Cultureel Planbureau. As of 28 April 2014: http://www.scp.nl/Publicaties/Alle_publicaties/Publicaties_2014/Geloven_binnen_en_buiten_verband

Council of Ministers. 2014. 'Decision Number (107) of 25/6/1410h' As of 29 November 2014: http://www.boe.gov.sa/printsystem.aspx?lang=ar&systemid=180&versionid=195

Department of Education. 2010. 'Homepage' As of 29 November 2014 http://inst.hqmio-edu.org/login.aspx?ReturnUrl=%2fadmincp%2fDefault.aspx

Department of Zakat & Income Tax. 2014a. 'Brief About DZIT'. As of 29 November 2014: https://dzit.gov.sa/en/brief-about-dzit

———. 2014b. 'Mission & Vision'. As of 29 November 2014: https://dzit.gov.sa/en/mission-vision

———. 2014c. 'Zakat Regulations'. As of 29 November 2014: https://dzit.gov.sa/en/zakat-regulations

DIB. 2014. *Duyuru. Yurtdışı Sözleşmeli Din Görevlisi Sınavı*. DIB As of 22 October 2014: http://www2.diyanet.gov.tr/DisIliskilerGenelMudurlugu/Documents/2013sozlesmeli/duyuru.pdf

Dickinson, E. 2014. 'The Case Against Qatar'*Foreign Policy*, September 30. As of 16 February 2015: foreignpolicy.com/2014/09/30/the-case-against-qatar/

Direct Aid. .2015a 'Aina na3malu'. As of 12 January 2015: http://direct-aid.org/cms/about-us-ar/where-we-work-ar/

———. 2015b. 'al-Isdarat al-Iliktrunia'. As of 12 January 2015: http://direct-aid.org/cms/portfolio_category/ebooks-ar/#

Dubai Cares. 2014a. 'Our Story'. As of 6 November 2014: http://www.dubaicares.ae/en/article/about-us/our-story-1.html

———. 2014b. 'Our Vision'. As of 6 November 2014: http://www.dubaicares.ae/en/article/about-us/our-vision.html

———. 2014c. 'Where We Work'. As of 6 November 2014: http://www.dubaicares.ae/en/section/where-we-work?allowtransparency=true&initialLoad=1&width=860&height=420&TB_iframe=true

Dubai Charity Association. 2008. 'Mashari3'. As of 7 November 2014:http://www.dubaicharity.org.ae/Docs.ArabicViewer/47a14220-ca1e-442a-9827-048c417d48c8/Default.aspx

———. 2014. As of 7 November 2014: http://www.dubaicharity.org.ae/Docs.ArabicViewer/89c266d6-4d90-483a-9f92-c894ad78fd25/Default.aspx#

———. n.d. *al-Mashari3*. As of 7 November 2014: http://dubaicharity.ae/images/Dubai%20Charity.pdf

Dubai Foundation for Women and Children. 2009. 'Homepage'. As of 6 November 2014: http://www.dfwac.ae/en/

Diyanet. 2011. HDV Bulten Ozel Sayi 2010. As of 15 February 2015: http://issuu.com/diyanet/docs/hdv_bulten_ozel_sayi_2010/12

———. 2014. Diyanet faaliyet raporu 2013. As of 15 February 2015: http://issuu.com/diyanet/docs/diyanet_faaliyet_raporu_2013/21

Educational Affairs Department. 2014.3an al-mauqi3' As of 29 November 2014: http://scholarship.hqmio-edu.org/Statics/AboutUs.aspx

Egatha. 2009a. *Report on the Overall Performance of The International Islamic Relief (IIROSA'S) Projects & Programs 2011/2012.*Egatha. As of 29 November 2014: http://www.egatha.org/pdf/annualreport/iirosa_annualreport_3233_en.pdf

———. 2009b. *Annual report 1432/33.* As of 29 November 2014: http://www.egatha.org/pdf/annualreport/iirosa_annualreport_3334_ar.pdf

———2014. 'About us' As of 29 November 2014: http://www.egatha.org/eportal/index.php?option=com_content&view=article&id=2&Itemid=2

Eid Charity. 2014. 'Isdarat al-Mu'assasa'. As of 1 October 2014: http://www.eidcharity.net/site/index.php?page=dgroup&pid=154

El Barkany, L. 2007. 'Geloofsgemeenschap wil haar moskee.' *Trouw*, September 19. As of 20 December 2014: http://www.trouw.nl/tr/nl/4324/Nieuws/article/detail/1658927/2007/09/19/Geloofsgemeenschap-wil-haar-moskee.dhtml

El Qorchi, M., S. M. Maimbo, & J F. Wilson. 2003. *Informal Funds Transfer Systems: An Analysis of the Informal Hawala System*. The International Monetary Fund and the World Bank.

Emarat al-Youm. 2013. 'Khairiyya al-Shariqa tanaffadu mashru3 Iftar Sa'im fi 48 daula' As of 29 November 2014: http://www.emaratalyoum.com/ramadan/aiding-people/2013-07-20-1.592555

———. 2014. 'Ard tijariyya liMu'assasa Ras al-Khaima lila3mal al-Khairiyya' As of 29 November 2014: http://www.emaratalyoum.com/local-section/other/2014-09-22-1.711624

Emirate 24/7. 2012. 'DIB foundation donates Dh135m in charity' *Emirates 24/7*, July 23. As of 6 November 2014: http://www.emirates247.com/news/emirates/dib-foundation-donates-dh135m-in-charity-2012-07-23-1.468415

Emirates Charity. 2014. 'Dalil al-Tabarru3at'. As of 7 November 2014: http://www.ecp.ae/arabic/Charities/DubaiCharity/Catalog/Pages/ListCatalog.aspx?DonationTypeID=559

Emirates Red Crescent. 2013a. 'Construction'. As of 7 November 2014: http://www.rcuae.ae/construction.aspx

———. 2013b. 'External Projects'.As of 7 November 2014: http://www.rcuae.ae/externalproj.aspx

———. 2013c. 'Foundation and International Recognition'. As of 7 November 2014: http://www.rcuae.ae/Establishment.aspx

———. 2014. 'Al-Hilal al-Ahmar al-Imarati (bana' al-Masjid) As of 7 November 2014: https://www.youtube.com/watch?v=Ap1xgZDdYjk

Ewa'a Shelters for Women and Children. 2010. 'Homepage'. As of 6 November 2014: http://www.shwc.ae/default.aspx

FATF (Financial Action Task Force). 2012. *International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation: The FATF recommendations*. Paris: FATF. As of 6 December 2014: www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF_Recommendations.pdf

———. 2013. *The role of Hawala and other similar service providers in money laundering and terrorist financing*. As of5 January 2015: http://www.imolin.org/pdf/imolin/Role-of-hawala-and-similar-in-ml-tf-1.pdf

Financieel Expertise Centrum (2004) *Rapportage quickscan non-profitorganisaties en terrorismebestrijding*. Amsterdam: FEC. As of 30 December 2014: http://www.fec-partners.nl/media/23/70/811531/3/fec_rapportage_quickscan_nonprofitorganisaties_terrorismefinanciering_tcm46-218878.pdf

Ferris, E. 2011. 'Faith and Humanitarianism: It's Complicated'. *Journal of Refugee Studies* 24(3): 606-625.

FIU-NL (Finance Intelligence Unit Netherlands). 2014a. Money flows Somalia and the facilitators, *EU-Interpol conference Combating Prganized Crime at Sea, Brussels*. As of 5 January 2015: http://www.crimson.eu.com/assets/2014/06/FIU-NL_contribution_to_Interpol_meeting_Brussels_May_2014_-_public.pdf

———. 2014b. *Homepage*. As of 6 December 2014: http://en.fiu-nederland.nl/

———. 2014c. *List of Indicators*. As of 6 December 2014: http://en.fiu-nederland.nl/content/list-indicators

———. 2014d. *Duty to Report?* As of 6 December 2014: http://en.fiu-nederland.nl/content/duty-report

Flanigana, S.T. 2006. 'Charity as Resistance: Connections between Charity, Contentious Politics, and Terror' *Studies in Conflict & Terrorism* 29(7): 641-655

FORUM. 2010. *De positie van moslims in Nederland: Feiten en Cijfers.* Utrecht: FORUM.

Fujarah Welfare Association. 2009. 'Ma3lumat 7aula al-Jami3a' As of 29 November 2014: http://www.alkhairia.com/index.php?got=aboutus

GAIAE. 2014a- 'Goals, Principles & Responsibilities'. As of 5 November 2014: http://www.awqaf.gov.ae/About.aspx?Lang=EN&SectionID=12&RefID=860

———. 2014b. 'Official Fatwa Center' available at 30 November 2014: http://www.awqaf.gov.ae/Affair.aspx?Lang=EN&SectionID=14&RefID=868

Gatestone Institute. 2015. 'Austria: Civil Law vs. Sharia Law'. As of 29 January 2015: http://www.gatestoneinstitute.org/4798/austria-sharia-law

Global Humanitarian Assistance. 2013. *Global Humanitarian Assistance Report 2013*. As of 19 February 2015: http://www.globalhumanitarianassistance.org/wp-content/uploads/2013/07/GHA-Report-2013.pdf

Government of Kuwait. n.d. 'Waqf Foundation', Available: http://islam.gov.kw/Pages/en/MeetingsDetails.aspx?meetId=32

Ahmed, Habib. 2007. 'Waqf-Based Microfinance: Realizing the Social Role of Islamic Finance', *Integrating Awqaf in the Islamic Financial Sector seminar*.

Haberler.com. 2010. 'Hollanda Diyanet Vafki Pakistan Icin 500 Bin Euro Topladi.' *Haberler.com*, 7 September. As of 4 November 2014: http://www.haberler.com/hollanda-diyanet-vakfi-pakistan-icin-500-bin-euro-2226489-haberi/

HAI. 2010a. 'About Us'. As of 6 November 2014: https://www.hai.ae/ar/about-hai/about-us.aspx

———. 2010b. 'International Projects'. As of 6 November 2014: https://www.hai.ae/ar/hai-projects/internationl-projects.aspx

———. 2010c. 'HAI Worldwide'. As of 6 November 2014: https://www.hai.ae/ar/about-hai/work-areas.aspx

———. 2014.'Qa'ima al-Mashru'at', pp. 24-26. As of 6 November 2014: https://www.hai.ae/userfiles/mnu2014.pdf

HDV (Hollanda Diyanet Vakfi) . 2012*HDV Şübeler Yönetmeliği*Rotterdam: HDV. As of 3 November 2014: http://diyanet.nl/wp-content/uploads/standart/pdf/2013/HDV_SUBELER_YONETMELIGI_2012.pdf

———. 2014. 'Takdim'. As of 30 November 2014: http://www.diyanet.nl/takdim/

———. 2014a. '2014 Eğitim ve Öğretim Yılı Burs Müracaatları'. As of 22 October 2014: http://www.diyanet.nl/2014-egitim-ve-ogretim-yili-burs-muracaatlari

———. 2014b. 'Cenaze Yardımlaşma Fonu' As of 22 October 2014: http://www.diyanet.nl/cenaze-yardimlasma-fonu/

———. 2014c. 'Fitre-Zekât Fonu' , As of 22 October 2014: http://www.diyanet.nl/fitre-zekat-fonu/

———. 2014d. 'HDV Başkanları' , [Online] As of 22 October 2014: http://www.diyanet.nl/hdv-baskanlari/

———. 2014e. 'HDV İnşaat Komisyonu Kuruldu' As of 3 November 2014: http://www.diyanet.nl/hdv-insaat-komisyonu-kuruldu/

———. 2014f. 'Müşavir ve Ataşeler HDV Denetleme ve Rehberlik Komisyonuyla Toplandı' As of 22 October 2014: http://www.diyanet.nl/musavir-ve-ataseler-hdv-denetleme-ve-rehberlik-komisyonuyla-toplandi/

———. 2014g. 'Şube Cami Adresleri / Vestigingsadressen' As of 22 October 2014: http://www.diyanet.nl/hdv-cami-hizmetleri/sube-cami-adresleri/

Hegghammer, Thomas. 2006. 'Terrorist Recruitment and Radicalisation in Saudi Arabia' *Middle East Policy* 13(4): 39-60.

Hergueux, J. 2011. 'How does Religion bias the Allocation of Foreign Direct Investment? The Role of Institutions'. *International Economics* 128(4): 53-76.

Herb, M. 2002. 'Emirs and Parliaments in the Gulf', *Journal of Democracy*,13 (4): 41-47.

Hinnebusch, Raymond. 2003. *The International Politics of the Middle East*. Manchester: Manchester University Press.

Holy Quran Memorisation International ORG. 2014. '(68) Students Participated in the Competition of Quran Association in Sri Lanka Under the Auspices of HQMI Organization' As of 29 November 2014: http://www.hqmi.org.sa/news.php?op=ne&nid=455

———. 2014. 'Publications' As of 29 November 2014: http://www.hqmi.org.sa/service/index.php?op=ca&id=31

———. 2014. 'The Regional Quranic Contest Held in Rwanda' As of 29 November 2014: http://www.hqmi.org.sa/news.php?op=ne&nid=453

Honahadhramout.com. 2014a. 'Mu'assasa dar al-shifa' al-khariyya biSayoun tadshanu ghadan al-mwkhayyam al-tibbi al-khairyy biTarim' As of 29 November 2014: http://honahadhramout.com/2014/141027.html

———. 2014b. 'Mu'assasa Dar al-Shifa' wa sharika bitru Masila tadshan al-mukhayyam al-khairi al-awwal bimustashfa tarim al-3am' As of 28 November 2014: http://honahadhramout.com/2014/141243.html];

Humaid Bin Rashid Al Nouimi Foundation. 2013. 'Ahdaf'. As of 29 November 2014: http://hrnf.org/index.php/2013-02-20-08-59-23/2013-02-20-09-03-11

———. 2013. *Humid,* City: Humaid Bin Rashid Al Nouimi Foundation . As of 29 November 2014: http://hrnf.org/images/FINAL-HUMED.pdf

———. 2013. 'Mashari3 Mawsumiyya' As of 29 November 2014: http://hrnf.org/index.php/2013-11-17-23-05-01/dj-mediatools

HRW (Human Rights Watch) . 2006. *Funding the "Final War": LTTE Intimidation and Extortion in the Tamil Diaspora*. Volume 18 (1-C). New York: HRW As of 5 January 2015: http://www.hrw.org/reports/2006/ltte0306/4.htm

Hussein Abdulatif Charity Foundation. 2014a. 'Ahdafuna' As of 29 November 2014: http://ha-charity.org/%D8%A3%D9%87%D8%AF%D8%A7%D9%81%D9%86%D8%A7/

———. 2014b. 'Nabda 3an al-mu'assas' As of 29 November 2014: http://ha-charity.org/%D9%86%D8%A8%D8%B0%D9%87-%D8%B9%D9%86-%D8%A7%D9%84%D9%85%D8%A4%D8%B3%D8%B3/

———. 2014c. 'Tawasil ma3ana' As of 29 November 2014: http://ha-charity.org/%D8%AA%D9%88%D8%A7%D8%B5%D9%84-%D9%85%D8%B9%D9%86%D8%A7/

IACAD. 2006. *Resolution Number (12) for the year (2006). Rules for Licenses of Religious and Charitable Societies and Organization of their Activities in the Emirate of Dubai*. Dubai: IACAD. As of 10 November 2014:http://www.iacad.gov.ae/admin/storage/other/htmlDocs/Rules%20of%20Religious.pdf

———. 2014a. 'About Us'. As of 5 November 2014: http://www.iacad.gov.ae/en/Pages/aboutus.aspx?menuid=51

———. 2014b. 'Associations/foundations Charities Licensed'. As of 7 November 2014: http://www.iacad.gov.ae/EN/Pages/Listofcharity.aspx

———. 2014c. 'Masjid'. As of 5 November 2014:http://www.iacad.gov.ae/en/Pages/ConditionsOfBuildingNewMosque.aspx?menuid=39

———. 2014d. 'Licenses for Charity and Religious Centers'. As of 5 November 2014:http://www.iacad.gov.ae/en/Pages/CharityAndReligiousCentersRegulations.aspx?menuid=607 IACAD. 2014e. 'List of Charities'. As of 6 November 2014:http://www.iacad.gov.ae/ar/pages/listofcharity.aspx

———. 2014f. 'Publications'. As of 5 November 2014:http://www.iacad.gov.ae/en/Pages/ZadAlMuslim.aspx?menuid=346 IACAD. 2014g. 'The Charity Associations in Dubai' As of 28 November 2014: http://www.iacad.gov.ae/ar/pages/listofcharity.aspx

'īd al-khaīrīah. 2013. *hasād al-'ām 2013*, s.l.: 'īd al-khaīrīah.

IHC. 2013a. 'Dubai Commitment'. As of 6 November 2014: f http://www.ihc.ae/page/dubai-commitment

———. 2013b. 'Infographics'. As of 6 November 2014:http://www.ihc.ae/page/infographics

———. 2013c. 'Members Directory'. As of 6 November 2014: http://www.ihc.ae/page/member-directory

———. 2013d. 'Who We Are'. As of 6 November 2014:http://www.ihc.ae/page/who-we-are

IIFFE. 2014. As of 29 November 2014: http://iiffe.org/cgi-sys/defaultwebpage.cgi

IMF (International Monetary Fund). 2008. *Qatar: Detailed Assessment Report on Anti-Money Laundering and Combating the Financing of Terrorism*, Washington, D.C.: International Monetary Fund.

Interkerkelijk Contact in Overheidszaken. 2014. 'CIOWeb, ANBI.' As of 30 January 2014: http://www.cioweb.nl/cio/index.php?id=155

International Commission for Human Development. 2014a. 'Majallat 3amal al-ha'ia' As of 29 November 2014: http://www.hdevelop.org/areas.html

———. 2014b. 'Muqaddima' As of 29 November 2014: http://www.hdevelop.org/about.html

International Commission for Technological Means. 2014. 'Homepage'. As of 29 November 2014: http://wasael.org/new

International Commission on Scientific Signs in Quran and Sunna. 2014a. 'Authority Offices' As of 29 November 2014: http://www.eajaz.org/index.php/Authority/Authority-offices

———. 2014b. 'Foreign Offices – Austria, Vienna' As of 29 November 2014: http://www.eajaz.org/index.php/Authority/Authority-offices/1072

———. 2014c. 'Medicine and Life Sciences' As of http://www.eajaz.org/index.php/Scientific-Miracles/Medicine-and-Life-Sciences

———. 2014d. 'Ta'sis wa tatwir' As of 29 November 2014: http://www.eajaz.org/index.php/Authority

———. 2014e. 'The Most Important Achievements' As of 29 November 2014: http://www.eajaz.org/index.php/Authority/The-most-important-achievements

International Islamic Charity Organization. 2008. 'al-taqrīr al-sanūī.'

———. 2014a. 'al-taqrīr al-sanūīah.' As of 26 October 2014: http://www.iico.org/iicolive/InnerPageContent.aspx?Pg_id=1&Pg_dtl_id=13

———. 2014b. 'Shurkāūna fi al-khaīr.' As pf 26 October 2014:http://www.iico.org/iicolive/InnerPageContent.aspx?Pg_id=1&Pg_dtl_id=12

International Organisation for Reconstruction and Development. 2013. 'al-ta3rif bilmu'assasa' As of 29 November 2014: http://portal.eamar.org/pages_show.php?show=2

———. 2014a. 'al-taqrir al-dauriyy' As of 29 November 2014: https://drive.google.com/viewerng/viewer?url=http://portal.eamar.org//upload/1caKOcEJ6BO8.pdf&embedded=true

Intern———. 2014b. *Dalil ila al-khair 1435*-1436. As of 29 November 2014: http://portal.eamar.org//upload/7k4e5a9c8F1A.pdf

Islam Presentation Committee. 2014a. 'al-majalāt al-da'uwīah.' As of 30 October: 2014 http://www.ipc.org.kw/magazine-2.htmlIslam Presentation Committee. 2014b. 'Vān Dūrn...sāni' "Al-islām fūbīā"' As of 30 October 2014: http://ipc.org.kw/english.php/album/31/upload/pdf_projects/storyprint-103.html

Islamic Aid. n.d. 'How you can help'. As of November 2014: https://www.islamicaid.com/how-you-can-help/single-donate/?gclid=CMjN5vav-70CFYuXOgod_Q0A5Q

Islamic Group for Fiqh (homepage). 2014.'Homepage' As of 29 November 2014: http://ar.themwl.org/node/11

Islamic International Foundation for Economic & Finance. 2014. '3an al-ha'ia' As of 29 November 2014: http://main.iifef.com/?page_id=18

———. n.d. 80 fa3alia Mecca: Islamic International Foundation for Economic & Finance. As of 29 November 2014: https://www.dropbox.com/s/4bvtpflbitxmv8w/80.pdf

Islamic Social Finance Report. 2014.

Gözaydın, İştar B. 2008. 'Diyanet and Politics' *The Muslim World* 98(2-3): 216 - 227.

Jaber, K. A. 2010. 'Dissolution of Qatari Authority for charitable activities is a setback.' *The Peninsula*, May 3. As of 16 February 2015: http://thepeninsulaqatar.com/views/editor-in-chief/1787/dissolution-of-qataria-authority-for-charitable-activities-is-a-setback

Jam3ia al-Baraka al-Khairiyya. 2014. 'Man nahnu'. As of 29 November 2014: http://www.albarakah.org.sa/default_ar.aspx?id=143&Name=%D9%85%D9%86_%D9%86%D8%AD%D9%86

jamaʿīat al-islāh al-ijtimāʿī al-kuwait. 2009. *taqrīr al-sanābal al-thāmin 2008-2009.*

———. 2014a. 'al-amānah al-ʿāmah lil'amil al-khaīrī.' Khaironline.net. As of 25 October 2014:http://www.khaironline.net/AboutUs.Aspx

———.2014b. 'albūm suwar.' Khaironline.net. As of 25 October 2014: http://www.khaironline.net/WhatIsNew_View.aspx?id=63

———. 2014c. 'binā masājid.' Khaironline.net. As o 25 October 2014: http://www.khaironline.net/ProjectsByCategory.aspx?Cat=1

———. 2014d. Khaironline.net. As of 25 October 2014: http://www.khaironline.net/WhatIsNew_list.aspx

———. 2015. Khaironline.net. As of 12 Jauary 2015: http://www.khaironline.net/Countries_List.aspx

jamaʿīat al-islāh al-ijtimāʿī. 2014. 'jamaʿīat al-islāh al-ijtimāʿī bidawlit al-kuwait'. As of 1 November 2014: http://eslah.com/?page_id=68>.jamaʿīat al-nijāh al-khaīrīah. 2011. *injāzāt 'ām 2011*.

———. 2014. *majalat al-bashrī*.

Jewish Heritage Europe- 2013. 'Cross-border project renovates synagogues in Debrecen, HU and Oradea, RO'., 12 November 2013. As of 13 February 2015: http://www.jewish-heritage-europe.eu/2013/11/12/cross-border-project-renovates-synagogues-in-debrecen-hu-and-oradea-ro/%E2%80%9D

Jewish Virtual Library. 2015. 'Israel Cabinet Ministries: Ministry of Religious Services'. As of 13 February 2015: http://www.jewishvirtuallibrary.org/jsource/Politics/relig.html

Jost, Patrick M. & Harjit Singh Sandhu. 2003. *Hawala: The Hawala Alternative Remittance System and its Role in Money Laundering.* Lyon: Interpol. As of 5 January 2015: http://www.treasury.gov/resource-center/terrorist-illicit-finance/Documents/FinCEN-Hawala-rpt.pdf

Kaf.org.sa. 2013a. ‘al-ahdaf al-istratijiyya’ As of 29 November 2014: http://www.kaf.org.sa/ar/PageDetailes.aspx?PageID=38&level=2&level2=5

———. 2013b. ‘al-Mashari3’ As of 29 November 2014: http://www.kaf.org.sa/ar/AllProjects.aspx?level=5&level2=2

———. 2013c. ‘al-Mashari3’ As of 29 November 2014: http://www.kaf.org.sa/ar/pDetailes.aspx?MID=35&level=5&level2=1

———. 2013d. ‘I7sa’iyat al-Mashari3’ As of 29 November 2014: http://www.kaf.org.sa/ar/pDetailes.aspx?MID=36&level=5&level2=3

———. 2013e. ‘Man Nahnu’ As of 29 November 2014: http://www.kaf.org.sa/ar/about.aspx?level=2&level2=1

KvK (Kamer van Koophandel). 2014. *Over het Handelsregister*, Amsterdam: KvK.

Katzman, Kenneth. 2014. ‘Kuwait: Security, Reform, and U.S. Policy’, Congressional Research Service, 29 April 2014. As of 12 January 2015: http://fpc.state.gov/documents/organization/225878.pdf

Kechichian, Joseph A. 1998. ‘Interview: Sultan Bin Zayed Al Nahyan’ *Middle East Policy*, 4(2), 188-191

Adri Kemps, interviewed by authors, 7 November 2014.

Khalaf Ahmad al-Habtoor Foundation (homepage). 2014. As of 7 November 2014: http://www.kahfoundation.org/

———. 2014a. ‘al-baramij al-dauliyya 2010’ As of 07 November 2014: http://www.khalifafoundation.ae/new/index.php?module=news&mid=2&iid=250&nid=357&catid=58

———. 2014b. ‘Injazat 2007’ As of 07 November 2014: http://www.khalifafoundation.ae/new/index.php?module=news&mid=2&iid=245&nid=351&catid=57

———. 2014c. ‘musa3adat mu’assasa Khalifa bin Zaiyd lila3mal al-insaniyya tasilu anha’ al-watan wa akthar min 45 daula fi al-3alam’ As of 07 November 2014: http://www.khalifafoundation.ae/new/index.php?module=news&nid=513&catid=70

———. 2014d. ‘Nabda 3an al-mu’assasa’ As of 07 November 2014: http://www.khalifafoundation.ae/new/index.php?module=news&mid=2&iid=231&nid=343&catid=56

———. 2014e. ‘Umm al-Quwain al-Khairiyya tatla3u 3ala mashari3 wa baramij mu’assasa Khalifa al-Insaniyya’ available at: http://www.khalifafoundation.ae/new/index.php?module=news&nid=720&catid=1

Khān, M.N. 2011. ‘al-minbar al-hūlandī lil-muslimīn...’ *Kuwait News Agency ,* January 9.

King Abdullah’s Relief Campaign for Pakistani People (homepage). 2010. ‘Homepage’. As of 29 November 2014: http://www.karcpp.org/AR/1st.php

———. 2010a. 'Future Projects' As of 29 November 2014: http://www.karcpp.org/future_projects.php

———. 2010b. 'Rehabilitation Projects' As of 29 November 2014: http://www.karcpp.org/rehabilitation.php

———2010c. 'Relief Work' As of 29 November 2014: http://www.karcpp.org/relief.php

———. 2010d. 'Seasonal Projects' As of 29 November 2014: http://www.karcpp.org/seasonal_projects.php

King Faisal Foundation. 2014. 'Homepage' As of 29 November 2014: http://www.kff.com/

Korany, Baghat & Moataz A. Fattah. 2008. 'Irreconcilable Role-Partners? Saudi Foreign Policy between the Ulama and the US in *The Foreign Policies of Arab States*, edited by Baghat Korany & Ali E. Hilal Dessouki. Cairo: The American University in Cairo Press.

KRO Reporter. 2007. 'De opmars van de moskeeën.' June 24. As of 15 February 2015: http://reporter.kro.nl/seizoenen/reporter-2007/afleveringen/24-06-2007

Nederland, islamitisch missieland. 4 February 2007. KRO Reporter. As of 19 February 2015: http://reporter.kro.nl/seizoenen/reporter-2007/afleveringen/04-02-2007

Lacroix, Stephane. 2011. *Awakening Islam: The Politics of Religious Dissent in Contemporary Saudi Arabia*. Cambridge, MA: Harvard University Press.

———. 2014. 'Saudi Arabia and the Limits of Post-Islamism' in *Post-Islamism: The Changing Faces of Political Islam,* edited by Asef Bayat, Oxford: Oxford University Press.

Landman, N (1999). *Kerkgenootschap, stichting of vereniging: De juridische structuur van islamitische organisaties in Nederland.*

———. 2014. Moskeegemeenschappen en hun organisatie in Nederland, In: *Geloofsgemeenschappen en recht*, edited by van L.C. Drimmelen and T.J. van der Ploeg, Den Haag: Boom.

Lawyers International Islamic Organization. 2014. 'About the organization' As of 29 November 2014: http://www.liio.org/index.php/en/about-us.html

Levitt P. 2003. '"You Know, Abraham Was Really the First Immigrant": Religion and Transnational Migration' *International Migration Review*, 37(3): 850

Luxembourg Ministry of Justice. 2015. As of 29 January 2015: http://www.mj.public.lu/legislation/asbl_fondations/Sensibilisation_asbl_et_fondations/index.html#_ftn1

Magharoui, A. M. 2001. 'Monarchy and Political Reform in Morocco' *Journal of Democracy* , 12(1): 73-86.

Majid al-Futtaim Charity Foundation. 2011a. 'About Us'. As of http://www.majidalfuttaimfoundation.com/About.aspx

———. 2011b. 'Ramadan Activities'. As of 7 November 2014: http://www.majidalfuttaimfoundation.com/Direct-Contributions/Ramadan-Activities.aspx

Maliepaard, M., & M. Gijberts. 2012. *Moslim in Nederland 2012*. The Hague: SCP.

Chibli, M. 2007. *Introduction to Middle Eastern Law.* Oxford: Oxford University Press.

manzamah al-da'wah al-islāmīah. 2010. al-taqrīr al-sanūī 2010, s.l.: manzamah al-da'wah al-islāmīah.

Masajid International Organisation. 2014a. 'Ahdafuna' As of 29 November 2014: http://www.masajid.org.sa/index.php?page_id=123&id=214&type=link

———. 2014b. 'al-ta3rif bilHa'ia' As of 29 November 2014: http://www.masajid.org.sa/index.php?page_id=120&id=200&type=link

——— (homepage). 2014. 'Homepage' As of http://www.masajid.org.sa/

———. 2014c. 'Jumhuriyya al-Iaman' As of 29 November 2014: http://www.masajid.org.sa/index.php?page_id=229&id=318&type=link

———. 2014d. 'Jumhuriyya al-Sudan' As of 29 November 2014: http://www.masajid.org.sa/index.php?page_id=144&id=325&type=link.

———. 2014e. 'Jumhuriyya Indunisia' As of 29 November 2014: http://www.masajid.org.sa/index.php?page_id=161&id=317&type=link

———. 2014f. 'Jumhuriyya Ithiubia' As of 29 November 2014: http://www.masajid.org.sa/index.php?page_id=231&id=319&type=link

———. 2014g. 'Masajid Mauritania' As of 29 November 2014: http://www.masajid.org.sa/index.php?page_id=232&id=323&type=link

MBRF Foundation. 2014a. 'A'ilati Taqra' As of 28 November 2014: http://www.mbrfoundation.ae/en/projects/Pages/A'elatiTaqra.aspx

———. 2014b. 'About' As of 28 November 2014: http://www.mbrfoundation.ae/en/Pages/default.aspx

———. 2014c. 'Arab Knowledge Report' As of 28 November 2014: http://www.mbrfoundation.ae/en/projects/Pages/AKR.aspx

———. 2014d. 'Bel3arabi' As of 28 November 2014: http://www.mbrfoundation.ae/en/projects/Pages/bel3arabi.aspx

———. 2014e. 'Dubai International Writing Program' As of 28 November 2014: http://www.mbrfoundation.ae/en/projects/Pages/DIWP.aspx

———. 2014f. 'Flashes' As of 28 November 2014: http://www.mbrfoundation.ae/en/projects/Pages/Flashes.aspx

———. 2014g. 'Kitab fi Daqa'iq' As of 28 November 2014: http://www.mbrfoundation.ae/en/projects/Pages/KitabFiDaqaaeq.aspx

———. 2014h. 'Wamadat' As of 28 November 2014: http://www.mbrfoundation.ae/en/projects/Pages/wamadat.aspx

Mecca Charity. 2012a. '3an al-mu'assasa' As of 29 November 2014: http://www.mc.org.sa/UI/MakkaPage.aspx?Id=6

———. 2012b. 'Indonesia' As of 29 November 2014: http://gal.mc.org.sa/book/indonesa.pdf

———. 2012c. 'Makatib al-mu'assasa' As of 29 November 2014: http://www.mc.org.sa/UI/OfficesCat.aspx

———. 2012d. 'Man nahnu' As of 29 November 2014: http://www.mc.org.sa/UI/MakkaPage.aspx?Id=7

———. 2012e. 'Somalia' As of 29 November 2014: http://gal.mc.org.sa/book/somail.pdf

Mejer, Roel . 2009. Global Salafism: Islam's New Religious Movement, Oxford: Oxford University Press.

Mendick, R., 2014. Terror financiers are living freely in Qatar, US discloses. The Telegraph, 16 November 2014.

MICAD (Ministry of International Cooperation and Development). 2013a. *Foreign Aid Reporting Framework of the United Arab Emirates*. Abu Dhabi: MICAD. As of 5 November 2014: http://www.micad.gov.ae/ReportingStandardsAndGuidlines/Foreign%20Aid%20Reporting%20Framework%20of%20the%20United%20Arab%20Emirates.pdf

———. 2013b. *UAE Foreign Aid Reports*. Abu Dhabi: MICAD. As of http://www.micad.gov.ae/ResourcesGuidelines/UAE%20Foreign%20Aid%20Report%202012.pdf

——— (Homepage). 2014. 'Homepage', As of 5 November 2014: http://www.micad.gov.ae/EN/Pages/Home.aspx

———. 2014a. 'About MICAD'. As of 5 November 2014: http://www.micad.gov.ae/EN/AboutOCFA/Pages/AboutMICAD.aspx

——— . 2014b. 'Maps'. As of 5 November 2014: http://www.micad.gov.ae/EN/CountriesEmergencies/Pages/Aid%20Map.aspx

———. 2014c. 'Minister Speeches'. As of 5 November 2014: http://www.micad.gov.ae/EN/MediaCenter/Pages/Minister%20Speeches.aspx

———. 2014d. 'Musa'adat Newsletter'. As of 5 November 2014: http://www.micad.gov.ae/EN/MediaCenter/Pages/NewsLetter.aspx

———. 2014e. 'Publications'. As of 5 November 2014: http://www.micad.gov.ae/EN/MediaCenter/Pages/Publications.aspx

———. 2014f. 'UAE Foreign Aid Reports'. As of 5 November 2014: http://www.micad.gov.ae/EN/ResourceGuidelines/Pages/Reports.aspx

Milli Görüş. 2014. Zekat Ve Fitre. As of 3 November 2014: http://www.milligorus.nl/tr/zekat-fitre

Milliyet Gazetesi. 2012. '2013'te en büyük pay Maliye Bakanlığı'na' As of 22 October 2014: http://www.milliyet.com.tr/2013-te-en-buyuk-pay-maliye-bakanligi-na/ekonomi/ekonomidetay/18.10.2012/1613817/default.htm

Minister of Interior Affairs and Kingdom Relations. 2009. 'Terrorismebestrijding.' Tweede Kamerstukken 2008-2009,29 754, nr. 145, 16 March 2009.

Ministry of Awqaf & Islamic Affairs, Kuwait. 2014. 'Waqf Foundation'. As of 13 February 2015:

Ministry of Awqaf & Islamic Affairs, Kuwait. Foreign Relations Department. n.d. As of 1 November 2014: http://site.islam.gov.kw/elaqat/ar/Pages/default.aspx

Ministry of Foreign Affairs. 2013. 'Musa3adat al-mamlaka al-kharijiyya' As of 29 December 2014: http://www.mofa.gov.sa/KingdomForeignPolicy/Pages/KingdomForeignAid101324.aspx

Ministry of Interior. 2014. 'Some Efforts and Procedures Undertaken by the Kingdom of Saudi Arabia in Combating Terrorism' available at http://www.moi.gov.sa/wps/portal/!ut/p/b1/jY_LCoMwEEW_xS_IxIlRlyE0D7WiLdqaTXFRRPCxKf3-Vvc-ZjdwDtxDHGmojzTmLPA5eRI3td--az_9PLXD8jv-0nl9R22QgrIXsKVNEtQ1ymwRmj8QyELa6IpUF1UIvgpZInkaAcNzvtTCsDADiDIdgBWmusUlIoiTPmycgCP_QdyKbBWk7ABYEldgr2EFdkbmZh7fZHSDUrHti87zfrSTMgo!/dl4/d5/L0lDU0lKSWdrbUEhIS9JRFJBQUlpQ2dBek15cXchLzRKQ2lEb01OdEJqdEJIZmxDRUEhL1o3X0IwMEU5QjFBME8wMDgwIHJ5GBO500I7000000_WCM&WCM_GLOBAL_CONTEXT=/wps/wcm/connect/MOI+Diwan/MOI+Home+Content/All+About+MOI/Profile/Some+Efforts+and+Procedures+Undertaken+by+the+Kingdom+of+Saudi+Arabia+in+Combating+Terrorism/

Ministry of Islamic Affairs, Endowments, Da'wah and guidance. 2009. 'Agencies' As of 29 December 2014: http://www.moia.gov.sa/Agencies/Pages/Agencies.aspx

———. 2009. 'Mission of the Ministry' As of 29 December 2014: http://www.moia.gov.sa/Eng/News/Pages/1389376887494.aspx

Ministry of Labour & Social Affairs (Webpage). 2014. *rūīt al-wazārih* As of 8 October 2014 http://www.molsa.gov.qa/Arabic/AboutMinistry/Vision/Pages/default.aspx

Ministry of Social Affairs and Labor: Mosal. 2014. 'About Us'As of 20 October 2014: http://www.mosal.gov.kw/MOSAL/static/about.jsf

Ministry of Social Affairs. 2008. *Law No. (2) for the year 2008.* Abu Dhabi: Ministry of Social Affairs. Arabic version as of 10 November 2014: http://www.msa.gov.ae/MSA/AR/Documents/Law1.pdf. English version as of 10 November 2014: http://www.msa.gov.ae/MSA/EN/Documents/RulesAndPolicies/Federal%20Law%20in%20respect%20of%20the%20national%20societies%20and%20associations%20of%20public%20welfare.pdf

Ministry of Social Affairs. 2012. 'Jam3ia al-Baraka al-khairiyya lilkhadamat al-ijtima3iyya' As of 29 November 2014: http://www.gg.org.sa/donor/viewcharityorganization?organizationId=852

Ministry of Social Affairs. 2014a. 'Initiatives 2008-2010'. As of 10 November 2014: http://www.msa.gov.ae/MSA/EN/Pages/Initiatives20082010.aspx?eqs=vuDaVZRpwRO7ElPUaRhsDw==

———. 2014b. 'Initiatives 2011-2013'. As of 10 November 2014: http://www.msa.gov.ae/MSA/EN/Pages/Initiatives20112013.aspx?eqs=vuDaVZRpwRO7ElPUaRhsDw==

———. 2014c. 'Strategic Objectives'. As of 10 November 2014: http://www.msa.gov.ae/MSA/EN/Pages/StrategicObjectives.aspx?eqs=l7BbbJMJkRpqzYApFL2tVg==

———. 2014d. 'Vision Mission & Values of the Ministry'. As of 10 November 2014:http://www.msa.gov.ae/MSA/EN/Pages/VisionMissionValues.aspx?eqs=l7BbbJMJkRpqzYApFL2tVg==

Pravesh, Mohammed. 2014. *ANBI-begrip verduidelijkt door de Geefwet?*Bachelor Thesis, Universiteit van Tilburg. As of 5 January 2014: http://arno.uvt.nl/show.cgi?fid=128779

Mohammad Omar Bin Haider Charity Establishment (homepage). 2014. As of 7 November 2014: http://www.mobh.group.com/

Monroe, S. L. 2012. 'Salafis in Parliament: Democratic Attitudes and Party Politics in the Gulf.' *The Middle East Journal*,66(3): 409-424

Moskeewijzer.nl. 2010. *Welkom op Moskeewijzer.nl.* As of 18 February 2015: http://www.moskeewijzer.nl

MWL. 2004a. 'al-Markaz al-Islamiyy al-thaqafiyy fi janub Hulanda' As of 29 November 2014: http://themwl.org/GLOBAL/ar/content/%D8%A7%D9%84%D9%85%D8%B1%D9%83%D8%B2-%D8%A7%D9%84%D8%A5%D8%B3%D9%84%D8%A7%D9%85%D9%8A-%D8%A7%D9%84%D8%AB%D9%82%D8%A7%D9%81%D9%8A-%D9%81%D9%8A-%D8%AC%D9%86%D9%88%D8%A8-%D9%87%D9%88%D9%84%D9%86%D8%AF%D8%A7

———. 2004b. 'High Authority for the Coordination of Islamic Organisations' As of 29 November 2014: http://www.themwl.org/bodies/default.aspx?d=1&bid=32&l=AR

———. 2004d. 'International Authority for the Muslim Woman and Family' As of 29 November 2014: http://www.themwl.org/bodies/default.aspx?d=1&bid=17&l=AR

———. 2004e. 'International Commission for Technological Means' As of 29 November 2014: http://www.themwl.org/bodies/default.aspx?d=1&bid=41&l=AR

———. 2004f. 'International Islamic Organisation for Halal' As of 29 November 2014: http://www.themwl.org/bodies/default.aspx?d=1&bid=36&l=AR

———. 2004g. 'Lawyers International Islamic Organisation' As of 29 November 2014: http://www.themwl.org/bodies/default.aspx?d=1&bid=37&l=AR

———. 2004h. 'Muslim International Authority for Education' As of 29 November 2014: http://www.themwl.org/bodies/default.aspx?d=1&bid=15&l=AR

———. 2004i. 'Profile' As of http://www.themwl.org/Profile/default.aspx?l=EN

———. 2004j. 'World Authority for Muslim Ulama' As of 29 November 2014: http://www.themwl.org/bodies/default.aspx?d=1&bid=33&l=AR

———. 2004k. 'World League for Introduction to Islam' As of 29 November 2014: http://www.themwl.org/bodies/default.aspx?d=1&bid=27&l=AR

Noonbooks.com. 2014. 'International Commission on Scientific Signs in Quran and Sunna' As of 29 November 2014: http://www.nooonbooks.com/advancedsearch/result/?q=%D8%A7%D9%84%D9%87%D9%8A%D8%A6%D8%A9+%D8%A7%D9%84%D8%B9%D8%A7%D9%84%D9%85%D9%8A%D8%A9+%D9%84%D9%84%D8%A5%D8%B9%D8%AC%D8%A7%D8%B2+%D8%A7%D9%84%D8%B9%D9%84%D9%85%D9%8A

Noor Dubai Foundation. 2011. 'History'. As of6 November 2014: http://www.noordubai.ae/en/AboutUs/History.aspx

OCFA. 2010. *UAE Foreign Aid Reports.* Abu Dhabi: OCFA. As of 19 February 2015: http://www.micad.gov.ae/ResourcesGuidelines/UAE%20Foreign%20Aid%202010%20-%20EN.pdf

———. 2011. *UAE Foreign Aid Reports.* Abu Dhabi: OCFA. As of 19 February 2015: http://www.micad.gov.ae/ResourcesGuidelines/UAE%20Foreign%20Aid%202010%20-%20EN.pdf

———. 2012. *UAE Foreign Aid Reports.* Abu Dhabi: OCFA. As of 15 February 2015: http://www.micad.gov.ae/ResourcesGuidelines/UAE_Foreign_Aid_2011_EN.pdf

Opstelten, I. . 2013. 'Kamerbrief over het Dreigingsbeeld Terrorisme in Nederland' (DTN 34). As of 7 November 2014: http://www.rijksoverheid.nl/documenten-en-publicaties/kamerstukken/2013/11/08/beleidsbevindingen-in-verband-met-het-dreigingsbeeld-terrorisme-in-nederland-dtn-34.html

Overdijk-Francis, J.E., P.M. R. Martens Van den Eijnden, & J.D. Gerritsen. 2009. Tweeluik Religie en Publiek Domein: Handvatten voor gemeenten. The Hague: Vereiniging van Nederlands Gemeenten. As of 13 February 2015: https://www.vng.nl/onderwerpenindex/integratie-en-asiel/integratie/publicaties/tweeluik-religie-en-publiek-domein-handvatten-voor-gemeenten

Pall, Z. 2014. *Kuwaiti Salafism and its Growing Influence in the Levant*. Washington, DC: Carnegie Endowment for International Peace.

Passas, N. 2009. *Informal Value Transfer Systems and Criminal Organizations: A Study Into So-called Underground Banking Networks*. Netherlands: Ministry of Justice.

Pathak, R. 2003. 'The Obstacles to Regulating the Hawala: A Cultural Norm or a Terrorist Hotbed?' *Fordham International Law Jorunal* 27(6): 2012

Petro Masila. 2014. 'Activities of Dar Al-Shifa Charitable Foundation's First Medical Camp was Concluded' As of 28 November 2014: http://www.petromasila.org/newsView.aspx?id=37

Physicians Across Continents. 2014a. 'Ahdafuna' As of http://pacglobal.org/?page_id=18

———nts. 2014b. 'Aina na3malu' As of 29 November 2014: http://pacglobal.org/?page_id=55&lang=en

———. 2014c. 'Man nahnu?' As of 29 November 2014: http://pacglobal.org/?page_id=8

Qantara.de. 2010. 'Jami3a Rutirdam al-Islamiyya' As of 10 November 2014: http://ar.qantara.de/content/jm-rwtrdm-lslmy-jm-slmy-brwy-msr

Qatar Charity. 2012. *litakūin jāhizah lilşlāh fi ramadān....* As of 5 October 2014: http://www.qcharity.com/a/index.php/2010-12-27-17-45-40/534-2012-04-22-07-07-31

———. 2014a. al-marākiz al-hidārīh fi ūrūbah. As of 30 September 2014 http://donations.qcharity.net/d/d/Compaign.aspx?id=23

———. 2014bc. 'Where we work'. As of 2 November 2014: https://qcharity.org.uk/

Qatar Television (Webpage). 2014. 'wamdāt.' qtva.qa.As of 8 October 2014: http://www.qtv.qa/qtv/program_details.php?pid=ODY=

Raf-Thani, n.d. [on-line] Available at: http://www.raf-thani.com/index.php?group=hasad&SLANG=A [Accessed 20 10 2014].

Rijskoverheid (2014). 'Opstelten: bestuur en toezicht stichtingen verbeteren.'As of 5 January 2014: http://www.rijksoverheid.nl/nieuws/2014/02/06/opstelten-bestuur-en-toezicht-stichtingen-verbeteren.html.

RMO (Raad voor Maatschappelijke Ontwikkeling). 2014. *RMO Briefadvies 'De kaders van de rechtsstaat – Over buitenlandse financiering van moskeeën en gebedshuizen'.* The Hague: RMO

Roex, K.M.H.D. 2013. *Leven als de profeet in Nederland: Over de salafi-beweging en democratie.* Amsterdam: Amsterdam Institute for Social Science Research (AISSR)

Royal Embassy of Saudi Arabia Washington.2014a. 'Country Information'. As of 29 November 2014:As of 29 November 2014: http://www.saudiembassy.net/about/country-information/ Royal Embassy of Saudi Arabia Washington. n.d. 'The Kingdom of Saudi Arabia'

Royal Embassy of Saudi Arabia. 2014. 'Saudi Arabia to fold Al-Haramain and other charities into National Commission; and with the United States jointly makes five designations to the United Nations under UNSCR 1267 of 1999' As of 29 November 2014: http://www.saudiembassy.net/archive/2004/press/page39.aspx

Rustow, Dankwart A. 1968. 'Atatürk as Founder of a State' *Daedalus* 97(3): 793-828.

sabar. 2014. 'jama'īah al-shaīkh 'abdāllah al-nūrī al-khaīrīah...' sabar.cc, 21 April. As of 25 October 2014 http://www.sabr.cc/inner.aspx?id=80453

SadaqaTV. 2015. 'Home'. As of 18 February 2015: http://sadaqa-tv.nl/

Salem, P. 2007. 'Kuwait: Politics in a Participatory Emirate', *Carnegie Endowment for International Peace.* As of 7 January 2015: http://carnegieendowment.org/files/cmec3_salem_kuwait_final1.pdf

şandūq al-zakāh al-qatari. 1997. *al-namā. al-namā*, 12.

şandūq al-zakāh al-qatari. 2009. *al-taqrīr al-sanūī 2008-2009*, s.l.: şandūq al-zakāh al-qatari.

şandūq al-zakāh al-qatari. 2010. *al-taqrīr al-sanūī 2009-2010*, s.l.: şandūq al-zakāh al-qatari.

şandūq al-zakāh al-qatari (Webpage). n.d. *man nahnu.* . As of 3 November 2014: http://www.zf.org.qa

Santing-Wubs, A.H. 2002. Kerken in geding: De burgerlijke rechter en de kerkelijke geschillen. Meppel: Boom.

Saqr Chairty. 2014a. 'About the Foundation'. As of 6 November 2014: http://www.saqrcharity.com/page.php?id=6&cat_name=aboutus

———. 2014b. 'al-Khadamat allati Nuqaddimuha'. As of 6 November 2014: http://www.saqrcharity.com/page.php?id=14&cat_name=service.

Saudi Charity Association for AIDS Patients. 2014. 'About SACA' As of 29 November 2014: http://www.saca.org.sa/en/about-saca.php

Saudi Embassy. 2014. 'Initiatives and Actions to Combat Terrorism' As of 29 November 2014: http://www.saudiembassy.net/files/PDF/Reports/Counterterrorism.pdf

Saudi Red Crescent Authority (homepage). 2014.'homepage' As of 29 November 2014: http://www.saudiredcrescent.com/index.html

———. 2014a. 'About Saudi Red Crescent Authority' As of 29 November 2014: http://www.saudiredcrescent.com/ourservices.html

———. 2014b. 'SRCA Issues' As of 29 November 2014 http://www.saudiredcrescent.com/ourissues.html

Saudi Relief and Committees Campaignsc. 2014. 'Saudi Relief and Committees Campaigns' As of 29 November 2014: http://srec.org.sa/

Saudi Relief and Committees Campaigns: Asia (homepage). 2014a. 'Homepage'. As of 29 November 2014: http://srec.org.sa/ar/asia/

———. 2014a. 'About'. As of 29 November 2014: http://srec.org.sa/ar/asia/thecommittee/about

———. 2014b. 'Baramij wa Mashru3at'. As of 29 November 2014: http://srec.org.sa/ar/asia/projects/overview .

———. 2014c. 'Mashru3 Farsh al-Masajid - Indunisia'. As of 29 November 2014:

Saudi Relief and Committees Campaigns: Gaza (homepage). 2014. 'Homepage' As of 29 November 2014 http://srec.org.sa/ar/gaza/

———. 2014a. 'al-ta'sis wa al-ahdaf' As of 29 November 2014 http://srec.org.sa/ar/gaza/thecommittee/establishment-and-objectives

———. 2014b. 'al-Baramij wa al-mashru3at' As of 29 November 2014 http://srec.org.sa/ar/gaza/projects/overview

Saudi Relief and Committees Campaigns: Iraq (homepage). 2014. As of 29 November 2014: http://srec.org.sa/ar/iraq/

———. 2014a. 'al-Baramij wa al-mashru3at' As of 29 November 2014: http://srec.org.sa/ar/iraq/projects/overview

———. 2014b. 'al-ta'sis wa al-ahdaf' As of 29 November 2014: http://srec.org.sa/ar/iraq/thecommittee/establishment-and-objectives

———. 2014c. 'Mashru3 tahil hay al-tashri3' As of 29 November 2014:

Saudi Relief and Committees Campaigns: Lebanon (homepage). 2014. 'Homepage' As of 29 November 2014: http://srec.org.sa/ar/lebanon

———. 2014a. 'al-baramij wa al-mashru3at' As of 29 November 2014: http://srec.org.sa/ar/lebanon/projects/overview

———. 2014b. 'al-Ta'sis wa al-ahdaf' As of 29 November 2014: http://srec.org.sa/ar/lebanon/thecommittee/establishment-and-objectives .

———. 2014c. 'Mashru3 tarmim al-masajid'. As of 29 November 2014: http://srec.org.sa/ar/asia/project/%D9%85%D8%B4%D8%B1%D9%88%D8%B9-%D9%81%D8%B1%D8%B4-%D8%A7%D9%84%D9%85%D8%B3%D8%A7%D8%AC%D8%AF-%D8%A5%D9%86%D8%AF%D9%88%D9%86%D9%8A%D8%B3%D9%8A%D8%A7

———. 2014d. 'Tajhiz masjid al-Saida 3a'isa Umm al-Mu'minin'. As of 27 November 2014: http://srec.org.sa/ar/lebanon/project/%D8%AA%D8%AC%D9%87%D9%8A%D8%B2-%D9%85%D8%B3%D8%AC%D8%AF-%D8%A7%D9%84%D8%B3%D9%8A%D8%AF%D8%A9-%D8%B9%D8%A7%D8%A6%D8%B4%D9%87-%D8%A3%D9%85-%D8%A7%D9%84%D9%85%D8%A4%D9%85%D9%86%D9%8A%D9%86

Saudi Relief and Committees Campaigns: Palestine (homepage). 2014. 'Homepage' As of 29 November 2014 http://srec.org.sa/ar/palestine/

———. 2014a. 'al-Baramij wa al-Mashru3at' As of 29 November 2014: http://srec.org.sa/ar/palestine/projects/overview

———. 2014b. 'al-Markaz al-Maliyy' As of 29 November 2014: http://srec.org.sa/ar/palestine/donation-mechanism/financialcenter

Saudi Relief and Committees Campaigns: Somalia (homepage). 2014. 'Homepage' As of 29 November 2014http://srec.org.sa/ar/somalia/

———. 2014a. 'al-Baramij wa al-Mashru3at' As of 29 November 2014 http://srec.org.sa/ar/somalia/projects/overview

Saudi Relief and Committees Campaigns: Syria. 2014a. 'al-baramij wa al-ahdaf' As of 29. November 2014: http://srec.org.sa/ar/syria/projects/overview

———. 2014b, 'al-Taqrir al-Usbu3iyy' As of 29. November 2014: http://srec.org.sa/ar/syria/donation-mechanism/financialcenter

Sayun.info. 2011. 'Mu'assasa Dar al-Shifa' al-Khairiyya taqimu nadwa Sihiyya fi kullia al-banat biSayun' As of 28 November 2014: http://www.sayun.info/view/2361.aspx

Sharjah Charity House. 2014. 'Homepage'. As of2 September 2014: www.schuae.net

Sharjah Charity International 2014. 'Sharjah Charity International'. As of 5 November 2014: http://www.shjc.sharjah.ae/

Sheikh Abdullah Al Nouri Charity Society. 2014. *taqārīr al-jama'īah*. As of 24 October 2014: http://alnouri.org/index.php?route=information/report

Sheikh Eid Charitable Association. 2014. *al-hasād al-sanūī*. As of 11 October 2014: http://www.eidcharity.net/site/index.php?page=dgroup&pid=376

Sheikh Eid Charitable Association. n.d. isdārāt al-mūsusah. [Online].

Sheikh Thani Bin Abdullah Foundation for Humanitarian Services. 2010. 'rāf" tastaqbil wafdā min wazārit al-shūūn al-ijtimā'īh'. As of 10 October 2014: http://www.rafmail.org/index.php?group=view&rid=282&SLANG=A

SheikhMohammed.com. 2014. 'Mohammed bin Rashid Charity and Humanitarian Establishment'. As of 6 November 2014: http://www.sheikhmohammed.com/vgn-ext-templating/v/index.jsp?vgnextoid=2511850c9b974310VgnVCM1000004d64a8c0RCRD&vgnextchannel=6a51fd70bdc04310VgnVCM1000004d64a8c0RCRD&vgnextfmt=default&date=1325067335027

SheykhMohammed.co.ae. 2014. 'Khairiyya Muhammad bin Rashid tatasallamu 10 malaiyyn draham min Dubai al-Islamiyy al-Insaniyya liIghatha al-suriyyn' As of 6 November 2014: http://www.sheikhmohammed.co.ae/vgn-ext-templating/v/index.jsp?vgnextoid=ab1ffaa2018e3410VgnVCM1000003f64a8c0RCRD&vgnextchannel=b40e73122c6e0310VgnVCM1000004d64a8c0RCRD&vgnextfmt=default&date=1391496694727

shubkat al-as'ham al-qatarīh. 2011. As of 10 October 2014: http://www.qatarshares.com/vb/showthread.php?471403-%C7%E1%D4%ED%CE-%C3%CD%E3%CF-%C7%E1%CD%E3%C7%CF%ED

Snoj, J. 2013. 'Population Qatar' As of 1 November 2014: http://www.bqdoha.com/2013/12/population-qatar

Soetenhorst, B. 2013. 'Koeweit betaalt moskeebestuurders voor islampromotie' *Het Parool*, August 10. As of 30 December 2014: http://www.parool.nl/parool/nl/4/AMSTERDAM/article/detail/3490289/2013/08/10/Koeweit-betaalt-moskeebestuurders-voor-islampromotie.dhtml

———. 2015. 'Turkse staatsislam slaat slag in strijd om Westermoskee.' *Het Parool,* January 27. As of 31 January 2015: http://www.parool.nl/parool/nl/4055/AMSTERDAM-WEST/article/detail/3838506/2015/01/27/Turkse-staatsislam-slaat-slag-in-strijd-om-Westermoskee.dhtml

Sonhaber.nl. 2010. 'HDV Suriye icin 57 bin euro topladi'. *Sonhaber.nl*, 17 Febuar. As of 4 November 2014: http://www.sonhaber.nl/gundem/hdv-suriye-icin-57-bin-euro-topladi-h27695.html

Spiegel, A. M. 2013. 'The fate of Morocco's Islamists'. *Foreign Policy*, July 9.

Sunier T., & N.Landman. 2014. *Turkse Islam. Acutualisatie van kennis over Turkse religieuze stromingen en organisaties in Nederland*. The Hague: Ministerie van Social Zaken en Werkgelegenheid.

TDV (Turkiye Diyanet Vakfi). 2014.As of 4 November 2014: http://www.diyanetvakfi.org.tr/416/guncel/hollanda-diyanet-vakfi-yoksullukla-mucadele-icin-yardim-kampanyasi-duzenledi

Ter Horst, G. 2009. Brief over (1) De risico's van buitenlandse financieringen aan moskeeën […] (2) De Wegwijzer Façadepolitiek […] (2007-2008, 29754, nr 113). Datum 16 maart 2009.

The CIA World Factbook. As of 19 November 2014: https://www.cia.gov/library/publications/the-world-factbook/geos/tu.html,

The Emirates Airline Foundation. 2014a. 'About Us'. As of 7 November 2014: http://www.emiratesairlinefoundation.org/english/about-us/about-us.aspx

———. 2014b. 'How We Help'. As of 7 November 2014: http://www.emiratesairlinefoundation.org/english/How-We-Help/How-we-help.aspx

———. 2014c. 'Projects'. As of 7 November 2014: http://www.emiratesairlinefoundation.org/english/Projects/Projects.aspx

The Global Commission for Introducing the Messenger (homepage). 2006. 'Homepage' As of 29 November 2014: http://www.mercyprophet.org/

———. 2006. 'List of Books in English' As of 29 November 2014: http://www.mercyprophet.org/mul/englishbooklist

The International Center for Not-for-Profit Law. 2014. 'NGO Law Monitos: Saudi Arabia' As of 29 November 2014: http://www.icnl.org/research/monitor/saudiarabia.html

The International Programme of the Charity Commission. 2014 'United Arab Emirates'. As of 10 November 2014: http://cci-ngoregnet.solutionsclient.co.uk/country_information_by_region/Middle_East_and_North_Africa/United_Arab_Emirates.asp

The Ministry of Finance of the Republic of Turkey. *2014. Yılı Bütçe Gerçekleşmeleri ve Beklentiler Raporu*. Instanbul: The Ministry of Finance of the Republic of Turkey.

The Presidency of Religious Affairs. 2014. *2.1 Cami sayısı*. As of 16 October 2014: http://www.diyanet.gov.tr/tr/kategori/istatistikler/136

The Saudi Fund for Development. 2014. 'al-ma3lumat al-asasiyya' As of 29 November 2014: http://www.sfd.gov.sa/webcenter/faces/oracle/webcenter/page/scopedMD/s5dc73d77_7324_4d08_b347_444721019cba/Page3.jspx?wc.contextURL=%2Fspaces%2Fsfdinternet&wc.originURL=%2Fspaces%2Fsfdinternet%2Fpage%2FSFD%2BInformation&_afrLoop=775584294049665#%40%3F_afrLoop%3D775584294049665%26wc.originURL%3D%252Fspaces%252Fsfdinternet%252Fpage%252FSFD%252BInformation%26wc.contextURL%3D%252Fspaces%252Fsfdinternet%26_adf.ctrl-state%3D10nquvude1_146

———. 2014. ‘Nashat al-sunduq al-tarakmiyy’ As of 29 November 2014: http://www.sfd.gov.sa/webcenter/faces/oracle/webcenter/page/scopedMD/s5dc73d77_7324_4d08_b347_444721019cba/Page2.jspx?wc.contextURL=%2Fspaces%2Fsfdinternet&wc.originURL=%2Fspaces%2Fsfdinternet%2Fpage%2FWhat%2Bis%2BSFD&_afrLoop=775897696145319#%40%3F_afrLoop%3D775897696145319%26wc.originURL%3D%252Fspaces%252Fsfdinternet%252Fpage%252FWhat%252Bis%252BSFD%26wc.contextURL%3D%252Fspaces%252Fsfdinternet%26_adf.ctrl-state%3D10nquvude1_1064

———. 2014. As of 29 November 2014: http://www.sfd.gov.sa/webcenter/faces/oracle/webcenter/page/scopedMD/s5dc73d77_7324_4d08_b347_444721019cba/Page48.jspx?wc.contextURL=%2Fspaces%2Fsfdinternet&wc.originURL=%2Fspaces%2Fsfdinternet%2Fpage%2FLoan%2Bactivities%2B%281975-2010%29&_afrLoop=775597181480508#%40%3F_afrLoop%3D775597181480508%26wc.originURL%3D%252Fspaces%252Fsfdinternet%252Fpage%252FLoan%252Bactivities%252B%25281975-2010%2529%26wc.contextURL%3D%252Fspaces%252Fsfdinternet%26_adf.ctrl-state%3D10nquvude1_414

The Turkish Parliament. 2014. ‘Turkiye Buyuk Millet Meclisi Baskanligina’. As of 24 October 2014: http://www2.tbmm.gov.tr/d24/7/7-39339c.pdf

The United Synagogue of Conservative Judaism (homepage). 2015., ‘Schechter Network and United Synagogue Announce $2 Million in Grants’ As of 13 February 2015: http://www.uscj.org/newsroom/pressreleasearchives/__2013/schechternetworkgrants.aspx

Trahim Foundation (homepage). 2014. As of 7 November 2014: http://www.tarahum.ae/

Turkish Statistical Institute . 2014. News Bulletin: Gayri Safi Yurtiçi Hasıla, IV. *Çeyrek: Ekim - Aralık*, March 31.

Turkish Statistical Institute (homepage). 2014.As of 19 November 2014: http://www.turkstat.gov.tr/Start.do

Tweede Kamer. 2009. Tweede Kamer stukken 2008-2009,29 654,nr. 145. Den Haag: Tweede Kamer.

———. 2012. Tweede Kamer stukken 2012-2013, 29 754, nr. 221. Den Haag: Tweede Kamer.

———. 2013. Tweede Kamer stukken 2013-2014, 32824-36, 14 november 2013. Den Haag: Tweede Kamer.

———. 2013. Tweede Kamer stukken, 2013-2014, 29 754, nr. 238. City: Tweede Kamer.

Twitter. 2014. *MBRH Charity*. As of 3 December 2014: https://twitter.com/MBRHCharity

U.S. Department of State, Bureau of Democracy, Human Rights and Labor. 2007. *International Religious Freedom Report 2007*. As of 19 November 2014: http://www.state.gov/j/drl/rls/irf/2007/90204.htm

———. 2011. *International Religious Freedom Report for 2011: Kuwait*.

———. 2012. *Saudi Arabia 2012 International Religious freedom Report*. As of 29 November 2014:http://www.state.gov/documents/organization/208622.pdf

U.S. Department of State. 2013. *International Religious Freedom Report for 2013: Qatar*. As of 24 October 2014: http://www.state.gov/j/drl/rls/irf/religiousfreedom/index.htm#wrapper

UK Charity Commission. 2014a. *Analysis of Consultation Responses and Changes to the Annual Return for 2015*. London: UK Charity Commission. As of 8 November 2014: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366059/Analysis_of_consultation_responses_and_changes_to_the_annual_return_for_2015.pdf

———. 2014b. *Compliance Toolkit: Protecting Charities from Harm*,London: UK Charity Commission. As of 8 November 2014. https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/346936/CT-2.pdf

———. 2014c. *Reporting Serious Incidents – guidance for trustees.* London: UK Charity Commission. As of 3 November 2014: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/375979/Reporting_Serious_Incidents_LowInk.pdf

Umm al-Quwain. 2014a. '2400 usra tastafidu min musa3adat khairiyya Umm al-Quwain' As of 29 November 2014: http://www.uaq.gov.ae/web/guest/articleDetails?articleId=25954

———. 2014b. 'al-Jam3ia al-khairiyya tanhi isti3dadaha lilshahr al-fadhil 11 khaima ramadaniyya wa mauqi3 litauzi3 al-wajibat al-iaumiyya fi Umm al-Qaiuin' As of 29 November 2014: http://www.uaq.gov.ae/web/guest/articleDetails?articleId=19843

———. 2014c. 'Musa3adat maliyya li541 muwazzafan wa 3amilan fi Umm al-Qaiuin' As of 29 November 2014: http://www.uaq.gov.ae/web/guest/articleDetails?articleId=24193

University of Sharjah. 2013. 'Mu'assasa 3isa Salih al-furq al-khairiyya tata3aqidu ma3a jami3a al-shariqa 3ala manah dirasiyya fi al-shari3a' As of 7 November 2014: http://www.sharjah.ac.ae/ar/about/news-center/Pages/news-details.aspx?mcid=471

Van Drimmelen L. C., R. Vis, & N. Landman. 2014. Grondgedachten en organisatorische hoofdlijnen van het christendom, het jodendom en de islam, In: *Geloofsgemeenschappen en recht* , edited by L. C. van Drimmelen, and T. J van der Ploeg., The Hague: Boom

Antonio Vicedomini, interviewed by authors, Douane, 21 August 2014

Visser, H. 2010. *Islamic Finance: Principles and Practice*. Cheltenham: Edward Elgar Publishing.

WAM. 2014. 'UAE Cabinet approves list of designated terrorist organisations, groups' As of 28 November 2014: http://www.wam.ae/en/news/emirates-international/1395272478814.html

wazārah al-khārjīah dawlit al-kuwait (Ministry of Foreign Affairs – Kuwait). 2014. tārīkh al-wazārah. As of 5 October 2014: http://www.mofa.gov.kw/Ar/Ministry/Pages/Ministry-history.aspx

wazārit al-'amal wa al-shūūn al-ijtimā'īh, dawlit Qatar (Ministry of Work and Social Affairs). n.d. al-jam'īāt wa al-mūsasāt al-khāsah, s.l.: wazārit al-'amal wa al-shūūn al-ijtimā'īh, dawlit qatar.

wazārit al-iwqāf wa al-shūūn al-islāmīh. 2014. As of 20 October 2014: http://habous.gov.ma/

———. 2012. nashrāt manjizāt wazārat al-awqāf... As of 10 October 2014: http://www.habous.gov.ma/

———. 2013a. al-taū'īah al-dīnīah. wazārit al-iwqāf wa al-shūūn al-islāmīh, al-mumlakah al-maghrebīah.

———. 2013b. tadbīr al-masājid. wazārit al-iwqāf wa al-shūūn al-islāmīh, al-mumlakah al-maghrebīah.

———. 2014. 'nubdhuh 'an al-wazārih.' As of 20 October 2014: http://www.islam.gov.qa/Articles.aspx?id=342&cnt=1&lf=185

wazārit al-khārjih, dawlit qatar. 2014a. akhtisāsat al-wazārah. As of 31 October 2014: http://www.mofa.gov.qa/ar/TheMinistry/Pages/Functions.aspx

———. 2014b. işdārāt āl-wazārih. As of 26 October 2014: http://www.mofa.gov.qa/ar/SiteServices/MediaCenter/Releases/Pages/default.aspx

Werbner, Pnina. 2002. 'The place which is diaspora: Citizenship, religion and gender in the making of chaordic transnationalism.' *Journal of Ethnic and Migration Studies*, 28(1): 119–133.

Wiktorowicz, Quintan. . 2006. 'Anatomy of the Salafi Movement' *Studies in Conflict and Terrorism*, 29: 207-239.

Willis, Michael J. 2009. 'Conclusion: The Dynamics of Reform in Morocco' *Mediterranean Politics* 14(2): 229-237.

Witteveen, T. A. 1984. *Overheid en nieuwe religieuze bewegingen*. Ph.D. thesis, Staatsuitgeverij.

The World Bank. 2001. Migration & Remittances Dataset (Dataset). As of 13 February 2015: http://econ.worldbank.org/WBSITE/EXTERNAL/EXTDEC/EXTDECPROSPECTS/0,,contentMDK:22759429~pagePK:64165401~piPK:64165026~theSitePK:476883,00.html

Johnson, P. 2007. Diaspora Philanthropy: Influences, Initiatives and Issues. *The Philanthropic Initiative Inc and the Global Equity Initiative at Harvard University*

The World Bank. 2014. *Data*. As of 31 October 2014: http://data.worldbank.org/indicator/NY.GDP.PCAP.CD.

Youtube. 2012a. *Film Watha'iqi 3n M'assasa Muhamma bin Rashid lila3mal al-khairiyya 1*. As of 3 December 2014: https://www.youtube.com/watch?v=aX7ft1oPsr4

———. 2012b. *Film Watha'iqi 3n M'assasa Muhamma bin Rashid lila3mal al-khairiyya – al-juz 2*. As of 3 December 2014: https://www.youtube.com/watch?v=6QeCtot0MKU

Zakat Fund. 2012a. *Masarif al-Zakati liSunduq al-Zakat li3am 2011*. As of 28 November 2014: http://zakatfund.gov.ae/zfp/AssetsManager/Files/2011-1.pdf

———. 2012b. . *Masarif al-Zakati liSunduq al-Zakat li3am 2011.* As of 28 November 2014: http://zakatfund.gov.ae/zfp/AssetsManager/Files/2011-2.pdf

———. 2012c. *Masarif al-Zakati liSunduq al-Zakat li3am 2011.* As of 28 November 2014: http://zakatfund.gov.ae/zfp/AssetsManager/Files/2011-3.pdf

———. 2012d. *Masarif al-Zakati liSunduq al-Zakat li3am 2011.* of 28 November 2014: http://zakatfund.gov.ae/zfp/AssetsManager/Files/2011-4.pdf

———. 2013a. *Masarif al-Zakati liSunduq al-Zakat li3am 2012.* As of 28 November 2014: http://zakatfund.gov.ae/zfp/AssetsManager/Files/2012-1.pdf

———. 2013b. *Masarif al-Zakati liSunduq al-Zakat li3am 2012.* As of 28 November 2014: http://zakatfund.gov.ae/zfp/AssetsManager/Files/2012-2.pdf

———. 2014b. 'Jam3iat Khairiyya' As of 28 November 2014: http://zakatfund.gov.ae/ZFP//web/Page_Charities.aspx

———. 2014c. 'Mashru3 Ajar wa 3afiyya (al-Mardha)' As of 28 November 2014: http://zakatfund.gov.ae/ZFP//web/projects/projectdetails.aspx?id=8

———. 2014d. 'Mashru3 Da3im' As of 28 November 2014: http://zakatfund.gov.ae/ZFP//web/projects/projectdetails.aspx?id=6

———. 2014e. 'Mashru3 Ina3a' As of 28 November 2014:http://zakatfund.gov.ae/ZFP//web/projects/projectdetails.aspx?id=18

———. 2014f. 'Mashru3 al-Muwatinat Zauja al-Ajnabiyy' As of 28 November 2014:http://zakatfund.gov.ae/ZFP//web/projects/projectdetails.aspx?id=4

———. 2014g. 'Mashru3 Tawasul' As of 28 November 2014: http://zakatfund.gov.ae/ZFP//web/projects/projectdetails.aspx?id=14

———. 2014h. 'Mashru3 Ummati (al-Muslimin al-Judud)' As of 28 November 2014: http://zakatfund.gov.ae/ZFP//web/projects/projectdetails.aspx?id=17

———. 2014i. *Strategy 2011-2013.* Zakat Fund. As of 28 November 2014: http://zakatfund.gov.ae/zfp/AssetsManager/Documents/strategiesEnglish2011-2013.pdf

———. 2014j. 'Zakat Introduction' As of 28 November 2014: http://zakatfund.gov.ae/ZFP//web/LinkDetails.aspx?id=zakatintroduction

Zakat House (Kuwait). n.d. *'adad al-mashārī' hasab fiat al-mashrū'.* Kuwait City: Zakat House.

———. 2006. *al-taqrīr al-sanūī 2005.* Kuwait City: Zakat House.

Zawya Islamic. 2014. *Islamic Social Finance Report 2014*. As of 13 February 2015:http://indiamicrofinance.com/wp-content/uploads/2014/03/Islamic-social-finance-report-2014.pdf

Zawya. 2014. As of 07 November 2014: http://www.zawya.com/ar/story/WAM20140119112039486/

Zayed Bin Sultan Al-Nahayan Charitable and Humanitarian Foundation. 2014a. 'Assistance Categories'. As of 6 November 2014:http://www.zayedfoundation.org/en/assistance-categories/

———. 2014b. 'Objectives'. As of 6 November 2014:http://www.zayedfoundation.org/en/objectives/

———. 2014c.'Projects in Africa & Europe'. As of 6 November 2014: http://www.zayedfoundation.org/en/hajj-programme-from-abroad/

———. 2014d.'Publications Achievements'. As of 6 November 2014:http://www.zayedfoundation.org/en/the-educational-programme/

Appendices

Appendix A: Methodology

A.1 Purposive sample: criteria for selection

A so-called purposive sample was created to ensure that a variety of mosques and HEIs were included that are of particular interest for a variety of reasons. Therefore, we identified those institutions that have featured prominently in the media for positive or negative reasons (including stories related to potential foreign funding). While the purposive sample does not aim to be representative, we have tried to somewhat balance the selection across a number of dimensions:

- Selection of a variety of institutions representing the diverse demography of the Muslim community in the Netherlands (i.e. including Turkish, Moroccan and other mosques);
- Selection of a variety of institutions representing the different religious backgrounds of Muslims in the Netherlands (including at least some explicitly Shia mosques);
- Selection of both HEIs in the Netherlands
- Some geographic spread (i.e. at least some mosques outside the Randstad) and balancing the selection of institutions in larger and smaller cities in the Netherlands

A.2 Random Sample

As the purposive sample is, by definition, not representative of the entire population of institutions, we have created a random sample of 20 institutions from the long-list. The institutions for this sample were selected by assigning all 355 long-list institution a number (from 1 to 355) and then applying a spreadsheet-based random generator to select an institution out of the total.[31] Subsequently, the selected institution was removed from of the long-list and the remaining institutions were numbered again, after which second institution was selected between 1 and 354. This process was repeated until the random sample contained twenty institutions.

[31] In Microsoft Excel, we used the syntax <RANDBETWEEN(1, 355)>, which returns a random integer number between (but including) 1 and 355. After removing the randomly selected institution and re-numbering the institutions remaining in the long-list, we applied the syntax <RANDBETWEEN(1, 354)>, and so on.

A.3 Case study analysis

Initial Searches

For each of the source countries we also reviewed some academic and grey literature (books, papers, reports) on Islamic and other religious institutions in the Netherlands and Western Europe. These studies mostly provided the contextual information about different religious and Diaspora organizations in the source countries and in the Netherlands.

In order to obtain a general overview of documents and materials available in the source countries, the research team carried out a series of search iterations in Arabic and Turkish through online search engines. Search iterations were carried out employing strings containing a variety of key terms referring to our fields of interest. The list included terms such as: foreign financing; foreign investment; regulatory environment; Islamic institutions; mosques; mosque construction; religious education; Zakat; Waqf; Sadaqa; Hawala; charity organisation; donation; donations. To narrow down results obtained to those pertaining to the source countries and destination country (i.e. the Netherlands) relevant to our study, some search iterations were repeated adding combinations of the following names: Netherlands Europe; Kuwait; Morocco; Qatar; Turkey; "Saudi Arabia"; "United Arab Emirates". An overview of the search terms employed in the first phase of desk research on source countries, along with their Arabic and Turkish translations, can be found in Table A.1.

The first fifty results of each search were scanned. However, some flexibility was retained so as to scan more results according to the relevance to our areas of interest of the first results. On the one hand, initial searches often yielded very generic results which were not always pertaining to the scope of this research (e.g. articles discussing rumours of Western funding for political parties in Egypt, generic articles on Muslim minority groups in the Netherlands). As for relevant results, in several instances, sources encountered were incidental news reports covering a handful of high-profile mosque-building projects throughout Europe (e.g. Al-Quds 2014, Qantara.de 2010). On the other hand, these first searches highlighted the existence of a conspicuous body of state institutions, funds and state registered charities dedicated to the administration and management of Islamic affairs, Islamic endowments, mosque building projects and generic da'wah activities throughout source countries.[32] This subsequently led the research team to adopt an approach to the review of source countries underpinned by a focus on source countries' ministries, institutions, funds and charities operating in the field of Islamic affairs and charitable work.

[32] The term da'wah ('call' in Arabic) is commonly used to describe Muslim proselytism activities. Da'wah activities can be aimed either towards non-Muslims, in a bid to encourage their conversion to Islam, or towards Muslims, in an effort to promote pious lifestyles and a stricter observance of religious principles by members of the community of Muslim faithfuls.

Table A.1: Terms initially searched (all coupled with the name of the source country and "Netherlands"

English	Arabic	Turkish
Foreign funding	التمويل الأجنبي*	"yabancı maliye" OR "yabancı yatırımlar"
Islamic institutions	المؤسسات الإسلامية*	"Müslüman kurumları"OR "İslam kurumları"
Foreign (direct) financing	ليومتلا يبنجالا رشابملا	"Doğrudan Yabancı Yatırım"
Mosque	مسجد	Camii
Religious education	التعليم الديني*	"din eğitimi"
Religious funding	التمويل الديني	"dini maliye"
Zakat	زكاة	Zekat
Waqf	وقف	Vakf
Hawala	حوالة	Havale
regulatory environment	البيئة التنظيمية*	"düzenleyici ortam"
Sadaqah	الصدقة	Sadaka
Donations	التبرعات	Bağışlar
Mosque constructions	تاءاشنا/ءانب دجاسم	Camii inşaatı
Salary AND Imam	راتب AND امام	Maaş AND İmam
Financial aid OR support	مساعدات مالية OR دعم مالي	Maliye yardımı OR desteği

NOTE: Arabic terms with an asterisk (*)were searched in quotes, limiting the search to the entire phrase instead of the individual words.

Search for information from public sector institutions

Based on our understanding of the institutional landscape in the source countries, we identified a list of public sector institutions that may potentially be involved in providing funding to Islamic institutions abroad. These institutions may include the Ministry of Foreign Affairs, the Zakat Fund, or the Ministry of Islamic Affairs in the selected source countries. This list was complemented with other institutions identified through our initial searches.

For each of the source countries we browsed the websites of these institutions, if available, for any relevant information. Within these sites, specifically, we searched for the Netherlands ('*Hollanda'* or *هولندا*) within these institutions' websites. We reviewed the availability of financial or audit information or annual reports. Also words such as "budget", "salary", 'imam', 'mosque', 'construction' and other relevant terms were used in combination with 'the Netherlands' during the initial search. Furthermore, we searched for the availability of annual reports or other (periodic) publications. Findings related to the subject of this study are reported for each of the reviewed public sector institutions.

Sample list cross-checking

Finally, we cross-checked the availability of online information about every institution in Table 2 with the sample list of 39 Islamic institutions in the Netherlands. Every Dutch institution's name and location was, if necessary, translated into Arabic or Turkish and checked for accuracy by confirming that a search engine query in these languages resulted in finding the correct institution. If the location was too specific

to yield many results (relative to results obtained when omitting the location), or was untranslatable, it was omitted and the Dutch institution's name was selected, along with the term 'The Netherlands' translated into Arabic. As Arabic translations for these Dutch institutions' names may vary, especially when institution names contain personal names, only translations confirmed by a third source (such as an Arabic version of the Dutch Institution's website), or containing only non-proper nouns, were searched as a phrase, rather than as individual words (for example, Masjad Al-Hiba was searched as the phrase, 'Masjad Al-Hiba' because it contains no proper nouns. Masjad Al Sabah was searched for as the two separate words Masjad and Al Sabah, as Al Sabah is a person's name).

Every institution was then coupled with every term in Table A.1 above (translated into Arabic or Turkish). The first 50 results, regardless of whether they contained all search terms, were investigated by reading the resulting paragraph on the Google search page. Of these 50, results with a relevant heading, or where the two terms appeared to relate to one another, were then followed-up on the original website.

Appendix B: Case study details

This appendix contains a more details about some of the source countries, including a review of those source countries institutions and organisations identified by the research team that did not reveal any relevant information. Furthermore, for each source country the appendix contains an overview of laws and dispositions regulating the establishment and work of public welfare organisations.

B.1 Kuwait

Box B.1: Overview of laws regulating charities

The Department of Charities and Charitable Trusts (DCCT), pursuant to the Ministry of Social Affairs and Labor, is responsible for overseeing all charities within Kuwait. In an October 2014 interview with an independent news source, Doctor Ahmed Al Sanigh, the head of DCCT, refuted the accusations levied by international bodies that Kuwaiti charities are laundering money (al-sīāsah 2014).All further information regarding laws regulating charities in Kuwait comes from this interview, whose reliability and content accuracy could not be independently verified.

In general, DCCT provides strict oversight of charities' activities, reviewing financial records and bank statements. To counter money laundering, DCCT will not deal in cash with charities. Furthermore, banks will not deal in cash, and will not allow charities to deposit funds without a letter of approval from MOSAL. Banks also refuse to accept deposits until the source of funds is confirmed. However, specific bank names are not mentioned.

According to the interview, although enforcement has been more relaxed in the past, the DCCT is now adopting a zero-tolerance policy towards charities which do not follow national laws, or do not act in accordance with the charity's stated mission. Violators will be referred to the Interior Ministry, who will enact further measures (also unspecified). Furthermore, unlicensed branches of charities will be shut down, and only those branches registered to operate in residential areas will be allowed to do so.

In the past, the cabinet was responsible for approving or declining notarization applications for new charities. Now, that responsibility has passed to MOSAL, and specifically to DCCT. DCCT must now thoroughly vet these new charities, provide preliminary approval or denial, and then pass their decision higher up the ranks in MOSAL to receive the final yes or no. Charitable organisations and foundations obtain legal personality only after the issuance of the license from the ministry and its publication in the Official Gazette (The Netherlands Embassy in Kuwait, pers. comm.).

Any association is allowed to fundraise, as long as they have gotten approval from DCCT for the proposed amount to be raised. Funds collected must also be shown to go to specific projects.

Projects outside of Kuwait are subject to special regulations and are operated through the Ministry of Foreign Affairs. Charities wishing to conduct a project abroad must apply to MOFA, which

will liaise with the country in question in order to approve or deny the project. Project-specific funds are then transferred from the charity to MOFA, then to the relevant Kuwaiti Embassy. The Embassy then distributes the funds for the project. However, overall monitoring mechanisms concerning donations to foreign institutions appear to be marred by a lack of clarity and transparency (The Netherlands Embassy in Kuwait, pers. comm.).

Al Sanigh further claims that DCCT works not only in conjunction with MOFA, but with a number of other ministries and private firms, holding almost weekly meetings with them.

According to Al Sanigh, there are currently ten charities within Kuwait, 90 charitable trusts, and 150 committees pursuant to these bodies (al-ṣāni': al-wada' la yahtamil mukhālifāt al-jama'īāt...).(al-sīāsah 2014). A list of only nine charities can be found on the Kuwait Government's Official Electronic Portal(al-'aml al-khaīrī fi dawlit al-kuwait 2014). In researching charitable activity in Kuwait, the list of nine was referred to, as Al Sanigh made no mention of specific names of the ten charities.

Of the nine mentioned above, six were selected for further investigation because they each conducted projects outside of Kuwait and not related to disaster relief and poverty alleviation. The Benevolent Work Charity, not on the Government's list, was also investigated because of its alleged ties to the Activist Salafi Movement in Kuwait (Pall 2014, 12). All of these charities' websites were then thoroughly combed for publications, current projects, and activities of associated *waqfs*. Internal searches for the terms "annual report" and "publications" were conducted if possible. The following is a summary of findings relevant to Islamic Institutions in the Netherlands.

International Islamic Charity Organization (IICO)

The IICO partners with most other Kuwaiti charities detailed here, along with Qatar Charity and other international associations (International Islamic Charity Organization 2014b). Annual reports from 2008, 2008–2009, 2009 and 2010–2011 are available on their website(International Islamic Charity Organization 2014a). According to the 2008 report, the IICO spent 5per cent of its budget, or approx. 2.1 million USD, on projects in Western Europe – the biggest allotment being given to construction projects (roughly 1 million USD). No other specifics are given (International Islamic Charity Organization 2012, 17). The 2009 report gives breakdown of project types and budgets by country, although none are in Western Europe (International Islamic Charity Organization 2012, 19). The report for 2010–2011 gives a total budget for Western Europe (2.4 million USD) and number of projects (4) (International Islamic Charity Organization 2012, 40). The IICO also publishes a periodic magazine: issues from 2014 were reviewed and contained no mention of the Netherlands or Europe (International Islamic Charity Organization, n.d.).

Al-Najat Charitable Society

The society's website publishes Annual Reports from 2011–2014 which provide details only as to type and number of projects abroad. No reports provide specific information on projects in the Netherlands (jama'īat al-nijāh al-khaīrīah 2011).

Also available is a monthly publication entitled 'Human Magazine'. The last four issues (137–140: July 2014 to October 2014) were reviewed: issue 139 outlines a Qur'an distribution undertaken by the Al Sunna Mosque in Amsterdam during Ramadan. It is unclear whether the mosque partnered with Al-Najat Charitable Society in this endeavour (jama'īat al-nijāh al-khaīrīah 2014).

Direct Aid

Direct Aid is a Kuwaiti based charity established in 1999 which aims to undertake and fund development projects and charitable activities to the benefit of the poor, sick, orphans and disadvantaged. Geographically speaking, the organisation focuses its activities in sub-Saharan African countries and does not appear to be active in Europe in general and the Netherlands in particular (Direct Aid 2015a). A review of the organisation's available yearly reports and publications did not present any information relevant to the scope of this study (Direct Aid 2015b).

The Benevolent Work Charity

A recent report put forth by the Carnegie Endowment for International Peace names the Benevolent Work Charity as a key organization of the Activist Salafi Movement in Kuwait. This organization is said to work with Eid Charity in Qatar, another Salafi Charity. The piece also accuses this charity of funnelling funds to militant rebel groups in Syria (Pall 2014, 12). Neither website nor relevant information was found when the above charity was searched in Arabic.

B.2 Morocco

Box B.2: Overview of laws regulating charities

Very little information regarding regulations on charities was found. Associatif.ma, or The Moroccan E-Magazine Specializing in Monitoring Associational News, did provide very detailed steps concerning the establishment of private associations, although information as to which ministries regulate these associations was not found. Steps for establishing an association include compiling a number of relevant details such as place of gathering, members, goals and focus, and then submitting a proposal for review to the local administrative authority. Of note is that the association is required to report any associated bodies and branches – meaning any partners abroad. This E-magazine could not be easily traced to the government, and does not provide government sources for the laws it outlines. Therefore, this source is unreliable (Associatif.ma 2014).

Of the list of fifteen charities that the search for "Charity of Morocco" brought up, only three were selected for further investigation (Al Noor Association for Social and Charitable Works, the Islamic Charity Association, and the Solidarity Association for Social Business). The other twelve were ruled out due to irrelevance of focus. the three selected where choosen not based on their relevance, but because not enough information could be obtained to determine even this. Websites could not even be found for these charities. The little information available did not pertain to Islamic Institutions in the Netherlands.

B.3 Qatar

Box B.3: Overview of laws regulating charities

The Qatar Authority for Charitable Activities (QACA), operating from 2004 to 2010, used to be responsible for keeping records of the nature of all outside transactions of registered charities, including verifying beneficiaries and performing on-site visits (IMF 2008, 185). The organization, though, appeared to have little real power over charitable institutions. Although these organizations were subject to penalties for breaking these laws, no organization ever faced sanctions. The Emir also had full power to exempt any charitable society from QACA's oversight (IMF 2008, 185). Furthermore, Charitable Trusts were not under QACA's supervision and were not subject to any regulation (IMF 2008, 185). QACA was dissolved in 2010 for unpublicized reasons (Jaber 2010).

Currently, the Administration of Private Associations and Institutions, a branch of the Ministry of Labor and Social Affairs (MOLSA), oversees all charitable work in Qatar (Sheikh Thani Bin Abdullah Foundation for Humanitarian Services 2010), although little information regarding the nature of this oversight is available. At the least, the administration has provided a list of 22 private organizations, including some charities, which it oversees (wazārit al-'amal wa al-shūūn al-ijtimā'īh, dawlit qatar).

The following charities were selected from this list of 22 because they each ran foreign projects focused outside of disaster relief and poverty alleviation. These charities' websites were then thoroughly combed for publications, current projects, and activities of associated *waqf*s. Internal searches for the terms "annual report" and "publications" were conducted if possible.

Ministry of Endowments and Islamic Affairs

This ministry is responsible for aspects of the government relating to Islam. It oversees mosques within Qatar, works to promote the religion, and is responsible for collecting and disseminating money in the State Zakat Fund (wazārit al-'amal wa al-shūūn al-ijtimā'īh, dawlit qatar, n.d.). Yet, all links to current projects and annual reports of the General Administration of *Waqf*s were not active, and no other traces of reports or publications were obtained. This ministry is also not mentioned in any of the other literature regarding Qatari Charities abroad.

Sheikh Eid bin Mohammad al Thani Charity:

A recent Carnegie Middle East Center report has called Eid charity "probably the biggest and most influential activist Salafi-controlled relief organization in the world" (Pall 2014). Nothing regarding this connection was found on Eid Charity's website. Annual reports from 2006 through 2013 were available (Sheikh Eid Charitable Association, n.d.), and the 2013 report did specify work in the Netherlands, although no other details were given ('īd al-khaīrīah 2013, 5). From a number of available periodic publications, none were found specifically having to do with European Islamic Institutions (Sheikh Eid Charitable Association 2014).

Sheikh Jassim bin Jaber bin Mahmoud Al-Thani Charity:

Multiple searches with different variations of the charity's name did not result in finding a website or publications. Still, the charity was frequently mentioned on other websites. Searches of this charity's name in conjunction with the Netherlands also proved fruitless.

Dawa Qatar:

This charity claims to work exclusively in Africa. The only annual report available, from 2010, specifies mosque constructions, although none in Europe (manzamah al-da'wah al-islāmīah 2010). No other publications are available.

Al-faisal Foundation:

The website provides no annual reports or publications: project descriptions are sparse, making no mention of the Netherlands.

Sheikh Thani bin Abdullah Foundation for Humanitarian Services (Raf-Thani):

Reports from 2009–2013 are available on the website Sheikh Thani Bin Abdullah Foundation for Humanitarian Services 2014) (Sheikh Thani Bin Abdullah Foundation for Humanitarian Services, n.d.). According to the 2013 annual report, Raf-Thani works in a number of European countries, although only 1.88 per cent of its annual budget for 2012 was allocated to the continent (Sheikh Thani Bin Abdullah Foundation for Humanitarian Services 2013, 76). In 2009, the Netherlands was listed as a recipient of an education project worth 500,000 Qatari Riyals (approx. 137,000 USD) (Sheikh Thani Bin Abdullah Foundation for Humanitarian Services 2010, 41). An education project in the Netherlands is again mentioned in 2010, but with a budget of 700,000 Qatari Riyals (approx. 192,000 USD). It is unclear if the two projects were the same, as no further details were given (Sheikh Thani Bin Abdullah Foundation for Humanitarian Services 2011). The only other connection to the Netherlands comes from the 2013 Annual Report, which displays a picture of children holding a banner indicating that Raf-Thani supports the Islamic Cultural Center of Helmond, in the Netherlands (Sheikh Thani Bin Abdullah Foundation for Humanitarian Services 2013, 100).

B.4 Saudi Arabia

B.4.1 State Institutions

Ministry of Social Affairs

The Ministry of Social Affairs was established in 1960 in a bid to promote and regulate social welfare organisations in the country. Through its website, the ministry maintains a list of all Saudi charity organisations it has licensed and registered, the total of which exceeds 900 groups and organisations. However, due to the existing regulations (see below), which limit the activities of organisations approved by the Ministry of Social Affairs to areas within Saudi Arabia only, no further information relevant to the scope of this study could be identified.

Ministry of Islamic Affairs, Endowments, Da'wah and Guidance

The Ministry of Islamic Affairs, Endowments, Da'wah and Guidance was established through Royal Decree No. 3/1414 in the year 1993. This Ministry and its agencies cover all Islamic affairs related issues within the Kingdom of Saudi Arabia, and da'wah related affairs outside of it (Ministry of Islamic Affairs, Endowments, Da'wah and guidance 2009a). In particular, it is tasked with: promoting Islam and related values in Saudi Arabia and abroad, building and maintenance of mosques and Islamic centres, regulation and monitoring of Islamic endowments, preparation and distribution of books and publications relating to Islam, including the Quran (Ministry of Islamic Affairs, Endowments, Da'wah and guidance 2009b). A review of the ministry website and of the annual reports and leaflets available through it highlighted the existence of an international dimension to the activities of the ministry. However, data available was marred by a general paucity of details and little more than generic information about the volume of activities carried out abroad was encountered. In particular, the ministry actively sustains preachers dispatched outside of Saudi Arabia, participates to international conferences and meetings pertaining to its areas of interest, translates and prints books relating to Islamic issues in several languages. No further information relevant to the scope of this study could be identified.

Department of Zakat and Income Tax

The Department of Zakat and Income Tax (DZIT) is a Saudi government agency that reports to the Ministry of Finance and oversees matters relating to Zakat since its establishment through Ministerial Resolution no. 394/1370 in June 1951 (Department of Zakat & Income Tax 2014). In Saudi Arabia, the payment of Zakat is compulsory for all nationals, as evidenced by a review of the country's laws and by-laws on the matter (Department of Zakat & Income Tax 2014c). In particular, the DZIT is tasked with collecting Zakat payments from Saudi and GCC nationals and business located in the country, promoting social awareness of and compliance with the concept of Zakat and prosecuting delinquent organisations and individuals defrauding Zakat payers by diverting their alms (Department of Zakat & Income Tax 2014b). With regards to this last issue, according to news sources, the DZIT appears to be actively trying to prevent the allocation of Zakat payments to ideologically 'deviant' groups and organisations (Al-Shorfa 2014). Payments collected by the DZIT are destined to projects undertaken by the Ministry of Soccial Affairs with the goal of advancing societal welfare within the country and assisting low-income families

and needy individuals. No further information relevant to the scope of this study could be identified through a review of the DZIT organisational website.

Saudi Fund for Development

The Saudi Fund for Development was established through Royal Decree No. 48/1394 in September 1974 (The Saudi Fund for Development 2014c). The Fund aims to participate in the financing of development projects in developing countries in the fields of social infrastructure, economic and industrial development (The Saudi Fund for Development 2014c). Projects are often funded in conjunction with other international funding agency (The Saudi Fund for Development 2014b). The Fund is mostly active in Asia and Africa with the only country outside of these continents where the fund has run projects being Cuba (The Saudi Fund for Development 2014a). The fund maintains an independent financial status although its Board of Directors is chaired by the Minister of Finance. A review of the institution's annual report did not present any further information relevant to the scope of this study.

Box B.4: Overview of laws regulating charities

A multiplicity of laws and regulations appear to impact the establishment, registration and work of public welfare societies in the Kingdom of Saudi Arabia. The licensing and work of public welfare societies (i.e. associations and foundations) in Saudi Arabia is currently regulated by Decision No. 107 issued by the Council of Ministers on 25 Jumada al Akheera 1410 (23 January 1990) (Council of Ministers 2014). The Ministry of Social Affairs is responsible for the implementation of regulatory provisions outlined in the law which comprise the establishment, registration, management and dissolution of public welfare societies. With regards to the scope of this study, the most crucial element prescribed by Decision No. 107/1990 is that of limiting the activities of public welfare organisations registered through the Ministry of Social Affairs within the Kingdom of Saudi Arabia only (Council of Ministers 2014, Ministry of Interior 2014). Chapter 1 of the law refers to charity associations. Section 1 of the chapter prescribes the necessary steps to undertake and documentation to provide in order to establish a charitable organisation. Article 5 presents a list of basic information whose inclusion is mandatory in the organisation statute. Among others, the list includes: the charity's mission, goals, geographic scope of activity, sources of funding and their management details as well as personal details of founding members (Council of Ministers 2014). Section 2 of this chapter focuses on the management and financial aspects of the organisation. In accordance to Article 10, charities and public welfare societies are required to submit to the Ministry of Social Affairs a copy of their financial review at the end of each fiscal year alongside a tentative budget for the upcoming one (Council of Ministers 2014). Article 11 prescribes a detailed list of records and documents that charities must maintain to ensure full accountability and transparency of their work. Lastly, according to circulars and rules issued by the Ministry of Social Affairs, organizations must make their transactions through checks and not cash. This regulation applies both to the disbursement of aid and assistance and to the collection of donations (Ministry of Interior 2014). With regards to donations, regulations issued by the Ministry further prevent cash fund-raising from personal donations except through licensed entities (Al-Shorfa 2014, Ministry of Interior 2014). Compliance with these regulations is reportedly ensured through direct financial oversight and review of societies balance by the Ministry's personnel (Royal Embassy of Saudi Arabia Washington 2014).

Discussions at the societal and institutional levels for an update of Decision No. 107/1990 have been ongoing in Saudi Arabia since the turn of the century, especially due to the ambiguous nature of this regulation with regards to the establishment and activities of non-governmental organisations (The International Center for Not-for-Profit Law 2014). In 2006, the Ministry of

Social Affairs proposed a draft Law on Associations and Foundations in order to provide a unified legal code, not only for charitable organisations and foundations, but for all types of civil society organisations. An updated version of the draft law was published by the Al Watan newspaper in 2008 (The International Center for Not-for-Profit Law 2014). According to Article 3 of this draft, the new law on association would nonetheless maintain a distinction between 'Charitable Societies' and 'Non-Governmental Organisations (NGOs)' on the basis of their goals and missions. Article 4 of the draft contained provisions for the establishment of a 'National Commission for Charitable Societies and Non-Governmental Organisations (Charity Commission 2008). According to article 6 of the draft law, the commission would be tasked with administering the registration, licensing, monitoring and financing of civil society organisations. Article 7 laid out the composition of the Commission as an independent inter-ministerial body, comprising representatives from the ministries of Social Affairs, Islamic Affairs, Higher Education, Interior and Trade. The draft law has remained idle since. In 2012, a member of the national Shoura Council, Abdurrahman al-Enad, expressed hope that the law on associations and foundations would be quickly approved and in 2013 activists from the Saudi civil society demanded the approval of a new law for civil society organisations (Civicus 2013). No further development on this issue have been reported since.

However, in a bid to enhance the accountability and transparency of the Saudi capital market and of its financial transactions, the Kingdom of Saudi Arabia maintains an active Capital Market Authority (CMA). The CMA has been active in the country since the 1950s, but its position has been officially regulated only in the 1980s (CBA 2014a). Based on the Capital Market Law of 2004, the CMA issued in 2008 and then amended in December 2013 the 'Anti-Money Laundering and Counter-Terrorist Financing Rules' (CBA 2014b). These rules call on all parties in the Kingdom dealing with non-profit organisations to classify transactions and work with this type of organisation as 'high risk' and to adopt ad hoc policies and enhanced due diligence procedures with them. The rules also prescribe a ban on payments in cash and set out detailed 'Record Keeping Requirements' so as to ensure full accountability and transparency of all monetary transactions referring to charities. Lastly, the CMA runs campaigns targeting, among others, charity organisations and foundations so as to raise awareness of good practices.

With regards to the Saudi charities active abroad, a review of practitioner websites and reports suggest the existence of a National Commission for Relief and Charity Work Abroad, allegedly tasked with monitoring and reviewing the work of charities and foundations active on the international stage (Charity Commission 2014, Royal Embassy of Saudi Arabia 2014a, 2014b). However, even though the establishment of the Commission has been announced since 2004, reports indicate that as late as 2007 the commission had not been established (Congressional Research Service 2007). After conducting targeted searches in both Arabic and English, the research team was unable to identify definitive information as to the current status of the proposed National Commission for Relief and Charity Work Abroad at the time of writing this report.

B.4.2 State Licensed Charities and Foundations

Saudi Relief and Committee Campaigns

The research team identified a group of humanitarian campaigns and relief councils established by the Saudi State to provide immediate humanitarian relief, rehabilitation and re-construction assistance to countries hit by natural disasters or conflicts (Saudi Relief and Committees Campaigns 2014). All these organisations maintain similar websites presenting a detailed account of donations received and expenses made in association to projects run. Most campaigns and councils have a clearly defined geographic scope of action and run projects aimed at providing either immediate humanitarian relief (e.g. food, clothing, health care) or reconstruction and social development assistance (e.g. housing units development, water

wells diggingm educational programmes). Most campaigns work on projects in coordination or partnership with other international organisations such as UNRWA, UNHCR, Red Cross, Red Crescent, and UNICEF. What follows is a review of each campaign and organisation's website.

King Abdullah's Relief Campaign for Pakistani People

Relief Campaign aiming to provide humanitarian relief, rehabilitation and reconstruction assistance to the people of Pakistan (King Abdullah's Relief Campaign for Pakistani People homepage 2010, King Abdullah's Relief Campaign for Pakistani People homepage 2010b, 2010c). The Campaign runs seasonal projects in occasion of Muslim festivities and of the month of Ramadan (King Abdullah's Relief Campaign for Pakistani People 2010d). The organisation lists 50 mosques construction projects among the future reconstruction projects that are planned to be undertaken in the country, but no further details are available (King Abdullah's Relief Campaign for Pakistani People 2010a).

Saudi Charity Campaign for the Relief of the Earthquake and Tsunami Victims in East Asia

Campaign established to provide humanitarian relief and assistance to people hailing from different countries in the Asian continent and Indian Ocean region who were hit by earthquakes or tsunamis (Saudi Relief and Committees Campaigns: Asia 2014a, 2014b). The campaign maintains a detailed account of donations received and expenses made in association to each project run (Saudi Relief and Committees Campaigns: Asia homepage 2014, Saudi Relief and Committees Campaigns: Asia 2014b). The Campaign has run mosques' construction projects in Indonesia for with a total budget of approximately 658,260 Saudi rial (Saudi Relief and Committees Campaigns: Asia 2014c).

Saudi Popular Charitable Campaign for the Relief of the Lebanese People

Campaign established to provide humanitarian relief and assistance to the Lebanese people in light of the 2006 July war (Saudi Relief and Committees Campaigns: Lebanon 2014b). The campaign maintains a detailed account of donations received and expenses made associated to each project (Saudi Relief and Committees Campaigns: Lebanon homepage 2014, Saudi Relief and Committees Campaigns: Lebanon 2014a). As part of the focus of the campaign's project aiming to the reconstruction of the country's infrastructure, the Campaign has run several mosques renovation and construction projects in Sidon and other parts of Lebanon worth approximately 600,000 Saudi rial (Saudi Relief and Committees Campaigns: Lebanon 2014d).

Saudi Council for the Relief of the Iraqi People

Council established in 2003 to provide humanitarian relief and assistance to the Iraqi people (Saudi Relief and Committees Campaigns: Iraq 2014b). The Council maintains a detailed account of donations received and expenses made with relative allocations to projects (Saudi Relief and Committees Campaigns: Iraq 2014a). A mosque construction project was reportedly undertaken as part of the broader reconstruction project of a neighbourhood in Baghdad (Saudi Relief and Committees Campaigns: Iraq 2014c).

Saudi National Campaign for the Support of Brothers in Syria

Saudi National Campaign aimed to support Syrian people displaced by the conflict in neighbouring countries, as well as Syrians and Palestinians still living in Syria (Saudi Relief and Committees Campaigns: Syria 2014a). Financial and annual reports are available through the Campaign website and indicate a predominance of projects aiming to support refugees through the establishment of shelters, as well as through the provision of medical assistance, food and educational programmes (Saudi Relief and Committees Campaigns: Syria 2014b). Projects are limited geographically to Syria, Lebanon, Turkey and Jordan.

Saudi Council for the Relief of the Palestinian People

Saudi Council established in 2000 with the aim of assisting the Palestinian population in the West Bank and Gaza through a series of social development and humanitarian relief projects (e.g. construction of social infrastructures, education programmes, food assistance). (Saudi Relief and Committees Campaigns: Palestine 2014a). The Council website maintains a detailed account of donations received, projects run, and related expenses (Saudi Relief and Committees Campaigns: Palestine homepage 2014, Saudi Relief and Committees Campaigns: Palestine 2014b). No indication of mosques and Islamic centres related projects were identified.

Custodian of the Two Holy Mosques Campaign for the Relief of the Palestinian People in Gaza

Campaign established in 2009 to provide relief and assistance to the population of the Gaza strip through a series of social development and humanitarian relief projects (e.g. construction of social infrastructures, education programmes, food assistance) (Saudi Relief and Committees Campaigns: Gaza 2014a). The campaign website maintains a detailed account of donations received, projects run and expenses allocated (Saudi Relief and Committees Campaigns: Gaza homepage 2014). No further information relevant to the scope of this study could be identified.

National Saudi Campaign for the Relief of the Somali People

Campaign established to coordinate Saudi donations towards Somalia (Saudi Relief and Committees Campaigns: Somalia homepage 2014). The campaign focuses on the provision of humanitarian relief (e.g. food, clothing, health care) and the development of social infrastructure, such as water wells (Saudi Relief and Committees Campaigns: Somalia 2014). The Campaign maintains a detailed account of donations received and expenditures made according to each project (Saudi Relief and Committees Campaigns: Somalia homepage 2014). No further information relevant to the scope of this study could be identified.

Muslim World League

The international, non-governmental Muslim World League is based in Saudi Arabia. The organisation was founded in 1962 and has since then seen the number of bodies and organisation stemming from its charter expand so as to cover various thematic areas (MWL 2004i). The organisation maintains an Islamic cultural centre in Tilburg which assists local Muslims by providing religious assistance services such as: family related counselling, religious courses and classes, seasonal activities (e.g. Ramadan) (MWL 2004a).

The following section contains a review of each individual body affiliated with the organisation as well as of the materials and sources available through each organisation's website.

Islamic Group for Fiqh

Organisation part of the Muslim World League established in 1972 and tasked with the issuing of ruling over Fiqh issues and monitoring of Islamic affairs (Islamic Group for Fiqh homepage 2014). The organisation liaises with national and regional level bodies active in the fields of Fiqh and Islamic jurisprudence. No further information relevant to the scope of this study could be identified.

International Islamic Relief Organization

The International Islamic Relief Organization is a charity organisation emanating from the Muslim World League and was established in 1978 (Egatha 2014). The organisation is active across several fields and undertakes different programs for humanitarian relief, social welfare (health care and education), da'wah and social infrastructures construction. As part of its social development and engineering departments programmes, the organisation carries out both mosques construction projects and religious programmes aimed at spreading teachings and knowledge of Islam. The organisation actively sponsors Islamic teachers and preachers around the world in 29 countries (Egatha 2008). For the year 2012, the organisation sponsored throughout the world the construction of 98 mosques alongside the sponsoring of 642 Quran projects and 306 Quran Centres (Egatha 2009, 37-39). During the same year, the organisation was active in Europe in Albania, Germany, Bulgaria, Bosnia, Switzerland, Kosovo and Macedonia. The budget allocation for Europe was equivalent to approximately 54,938 rial, none of which was destined to mosques construction projects, but rather towards social development and urgent relief ones (Egatha 2009, 16-21). The organisation maintains within Saudi Arabia a portfolio of endowments and investments to finance its work and activities (Egatha 2009, 37-39). No further information relevant to the scope of this study could be identified.

Holy Quran Memorization International Organization

International organisation with independent legal personality affiliated with the Muslim World League. The organisation was established in 2000 with the aim of encouraging and assisting the m emorisation of the Quran among Muslims. To pursue its goals, the organisation maintains an active network of Quran memorisation centres, provides scholarships, and organises contests and competitions of Quran memorisation (Department of Education homepage 2010, Education Affairs Department 2014, Holy Quran Memorisation International ORG 2014a, 2014c).Although the organisation produces a number of periodic and thematic publications, they were not accessible through the organisation's website at the time of writing this report (Holy Quran Memorisation International ORG 2014b). No further information relevant to the scope of this study could be identified.

Muslim International Authority for Education

Organisation affiliated with the Muslim World League established in 2000 (MWL 2004h). The organisation aims to assist the development and needs of educational programmes throughout the Islamic world. At the time of writing this report, the organisation's website was inaccessible and only a flag page on the Muslim World League webpage could be reviewed (IIFFE 2014, MWL 2004h).

International Authority for the Muslim Woman and Family

Organisation affiliated with the Muslim World League established in 2000 which aims to protect the rights of Muslim women and children in accordance to Islamic Shari'a (MWL 2004d). No further information was available through the organisation's website hosted on the Muslim World League webpage.

Mecca Charity

Charity organisation established in 1987 and affiliated with the Muslim World League (Mecca Charity 2012d). The organisation aims to assist orphans and needy Muslims both in Saudi Arabia and the broader Islamic world through the provision of relief, education, and social infrastructures (including mosques) (Mecca Charity 2012a). Besides Saudi Arabia, the organisation maintains active offices in Indonesia, Yemen, and Sudan and appears to be also active in Somalia (Mecca Charity 2012b, 2012c, 2012e). No further information relevant to the scope of this study was identified.

International Authority for New Muslims

Organisation part of the Muslim World League established in 2000. The organisation aims to provide assistance to new Muslims both through cooperation with Islamic centres and mosques who reach out to new converts, and through the establishment of ad hoc teaching programmes and materials for new Muslims (MWL 2004d). No further information was available through the organisation's website hosted on the Muslim World League webpage.

International Commission on Scientific Signs in Quran and Sunna

Organisation member of the Muslim World League, established in 1984. The Commission on Scientific Sings in Quran and Sunna is tasked with investigating, discussing and disseminating the presence and role of scientific knowledge and understanding within the Quran and prophetic Sunna (International Commission on Scientific Signs in Quran and Sunna 2014d). To achieve its goals, the organisation runs seminars, conferences and liaises with various Islamic and Scientific institutions through its office in Saudi Arabia and the rest of the world, including a European office in Vienna (International Commission on Scientific Signs in Quran and Sunna 2014a, 2014b, 2014e). The organisation publishes both periodic publications, some of which are available behind a paywall, and sporadic ones focusing on different scientific insights present in the Quran and prophetic Sunna (Noonbooks.com 2014).

World League for Introduction to Islam

Organisation established in 2004 and linked to the Muslim World League. The organisation aims to spread Islam and the correct interpretation of its values and message in different parts of the world and in different languages (MWL 2004k). At the time of writing this report, the organisation's website was inaccessible and only a flag page on the Muslim World League webpage could be reviewed (MWL 2004k).[33]

---

[33] See as of 15 November 2014: http://www.wwaii.org/

Islamic International Foundation for Economic & Finance

Organisation established in 2004 and linked to the Muslim World League (Islamic International Foundation for Economic & Finance 2014). The organisation aims to promote and coordinate the work of research institutes and universities active in the field of Islamic finance and Islamic economics (Islamic International Foundation for Economic & Finance, n.d.). No further information relevant to the scope of this study could be identified through the review of the organisation's website and of available materials.

International Organisation for Reconstruction and Development

Organisation established in 1999 and affiliated with the Muslim World League (International Organisation for Reconstruction and Development 2013). The International Organisation for Reconstruction and Development is active across several fields with programmes subsidising Islamic centres and institutions, undertaking da'wah activities, assisting orphans, providing humanitarian relief as well as religious assistance (e.g. seasonal Ramadan programmes, distribution of clothing, etc.). The organisation maintains a portfolio of endowments in Saudi Arabia and Lebanon. The organisation does carry out mosques and Islamic centres building and renovation projects, however they seem to be aimed at the African and Asian continents (International Organisation for Reconstruction and Development 2014a, 2014b).

High Authority for the Coordination of Islamic Organisations

International organisation established in 2006 and affiliated with the Muslim World League (MWL 2004b). The organisation aims to act as a platform coordinating and enhancing the work of registered Islamic organisations. At the moment of writing this report, the research team was unable to identify an organisational website other than a flag page on the Muslim World League webpage (MWL 2004b).No further information relevant to the scope of this study could be identified.

World Authority for Muslim Ulama

Organisation established in 2002 and affiliated with the Muslim World League. The organisation aims to act as contact point for Muslim scholars and thinkers so as to encourage the agreement of common positions over different issues (MWL 2004j). At the moment of writing this report, the research team was unable to identify an organisational website other than a flag page on the Muslim World League webpage (MWL 2004j). No further information relevant to the scope of this study could be identified.

The Global Commission for Introducing the Messenger

Organisation affiliated with the Muslim World League and tasked with the promotion of the figure of the Prophet Muhammad among non-Muslims (The Global Commission for Introducing the Messenger homepage 2006, The Global Commission for Introducing the Messenger 2006). The organisation maintains a platform website in several languages and distributes through it several publications focusing on the life and deeds of the Prophet Muhammad. Publications are specifically aimed at a non-Muslim audience as well as at Muslim children (The Global Commission for Introducing the Messenger 2006). No further information relevant to the scope of this study could be identified.

International Islamic Organisation for Halal

International organisation affiliated with the Muslim World League (MWL 2004f). This organisation aims to raise awareness at the world level about the standards and requirements of Halal products, not only with regards to food, but also for pharmaceuticals. At the moment of writing this report, the research team was unable to identify an organisational website other than a flag page on the Muslim World League webpage (MWL 2004f). No further information relevant to the scope of this study could be identified.

Lawyers International Islamic Organisation

Organisation affiliated with the Muslim World League and established with the aim of acting as a contact point between Muslim lawyers throughout the world (MWL 2004g). In particular, the organisation aims to promote lawyers' activities with regards to the tutelage of Islam in different countries as well as favouring trade and international exchange between Muslims at an economic level (Lawyers International Islamic Organization 2014). No further information relevant to the scope of this study could be identified.

Physicians Across Continents

Charitable organisation established in 2004 and affiliated with the Muslim World League. Physicians Across Continents aims to assist individuals in countries affected by natural disasters or crisis, regardless of their religion, gender or ethnicity. Currently, Physicians Across Continents is active in 28 countries with projects providing healthcare and medical assistance (Physicians Across Continents 2014a, 2014b, 2014c). No further information relevant to the scope of this study could be identified.

International Commission for Human Development

International organisation established in 2010 and affiliated with the Muslim World League (International Commission for Human Development 2014b). The International Commission for Human Development aims to increase the living conditions of Muslims worldwide and is active across several fields with education, rehabilitation, training, social and economic projects (International Commission for Human Development 2014a). Among its social programmes, the organisation explicitly mentions the construction of mosques as well as the support for individuals involved in da'wah activities and proselytism (International Commission for Human Development 2014a).

International Commission for Technological Means

International organisation affiliated with the Muslim World League and aiming to act as a platform for facilitating access and exchange of technological innovations for Muslim people (MWL 2004). At the moment of writing this report, the main organisational website of the Commission was accessible, but with no contents available (Internatioal Commission for Technological Means (homepage 2014). No further information relevant to the scope of this study could be identified.

Masajid International Organisation

International organisation affiliated with the Muslim World League, aiming to promote the construction and restoration of mosques alongside their functioning as a societal focal point. (Masajid International

Organisation 2014a, 2014b, Masajid International Organisation homepage 2014) The organisation appears to be active mostly in Indonesia, Yemen, Ethiopia, Mauritania, Benin, Ghana, and Sudan (Masajid International Organisation 2014c, 2014d, 2014e, 2014f, 2014g). Mosques construction projects in these countries are illustrated on the organisation's website with details relative to their size and cost. The organisation claims to be also active with projects aiming to support economically and spiritually Muslim preachers, but no further information could be retrieved from the organisation's website.

King Abdallah bin 'Abd al-'Aziz Charity [Dedicated to His Parents] for Housing Development

Saudi charity organisation established by King Abdallah bin 'Abd al-'Aziz in 2002 (Kaf.org.sa 2014e). This charity carries out a large number of social housing projects, however it is active only within the Kingdom of Saudi Arabia and its services are aimed at needy Saudi nationals only (Kaf.org.sa 2014a, 2014b, 2014c, 2013d).

World Organisation of the Custodian of the Two Holy Mosques for Charitable and Humanitarian Work

Since 2010 several news items surfaced about the establishment of the 'World Organisation of the Custodian of the Two Holy Mosques for Charitable and Humanitarian Work'. This organisation was established in order to serve the Muslims throughout the world with social infrastructures programmes for hospitals and health related structures, schools, mosques, Islamic centres, libraries, humanitarian relief, etc. However, the research team was unable to identify an official organisational website for this organisation (al-Riyadh 2010, Al-Sharq al-Aswat 2010). As of January 2014, however, the organisation was reportedly kick starting a project aimed at improving facilities for individuals with kidney failures and in need of dialysis within the Kingdom of Saudi Arabia (Al-Riyadh 2014).

Barakah Charity

Saudi charity organisation established in 2009 and based in Dammam. This charity is registered under the umbrella of the Ministry of Social Affairs, its activities focus on the provision of support and assistance to needy families and children in the area of Damman (Jam3ia al-Baraka al-Khairiyya 2014, Ministry of Social Affairs 2012). No further information relevant to the scope of this study could be identified through a review of the organisation's website.

Saudi Red Crescent Authority

Saudi authority founded in 1935 and tasked with the provision of first-aid medical assistance throughout the Kingdom of Saudi Arabia (Saudi Red Crescent Authority 2014a). Besides the provision of daily assistance to Saudi citizens, the organisation's main body of work seems to be represented by the assistance provided to Hajj pilgrims visiting Mecca and Medina every year (Saudi Red Crescent Authority homepage 2014). A limited number of issues from the organisation periodic publication 'Al-Is'af' were advertised but inaccessible through the website (Saudi Red Crescent Authority 2014b). No further information relevant to the scope of this study could be identified through a review of the organisation's website.

Alwaleed Bin Talal Foundation

This organisation was originally established in 1996 with the name of 'Kingdom Foundation' and subsequently renamed 'Alwaleed Bin Talal Foundation' in 2009 (Alwaleed Bin Talal Foundation 2014a). The organisation manages a vast portfolio of projects both inside Saudi Arabia and throughout the world. The organisation's work is organised in thematic areas of 'community development', 'disaster recovery', 'global cultural understanding', and 'women's empowerment' (Alwaleed Bin Talal Foundation 2014b, 2014c, 2014d, 2014e). A review of the organisation website's section dedicated to global projects did not highlight any mosques' or Islamic centres' construction projects, but rather projects focused on the promotion of scholarly research on Islam-related thematic areas as well as of programmes aiming at socio-economic development in low-income countries (Alwaleed Bin Talal Foundation 2014d). No further information relevant to the scope of this study could be identified through a review of the organisation's website.

Saudi Charity Association for AIDS Patients

Saudi charity association established in 2008 and active in the regions of Mecca and Jedda. The organisation aims to raise societal awareness of AIDS as well as to help remove the widespread social stigma attached to this condition and to help individuals and families affected by it (Saudi Charity Association for AIDS Patients 2014). A review of the organisation's website and publications did not present further information relevant to the scope of this study.

Awasser Charity Organisation

Saudi charity organisation supervised by the Ministry of Interior and tasked with providing assistance to Saudi families living abroad. The charity provides families with assistance both during their stay abroad and during their phase of return (Awasser 2013) No further information relevant to the scope of this study could be identified through a review of the organisation's website.

Albasar International Foundation

Saudi international charity established in 1989 and active in the field of prevention of blindness (Albasar International Foundation 2012a, 2012d, 2012e). The organisation is reportedly active in several countries in Africa and Asia, both with temporary units providing ophthalmological assistance and with projects aimed at the establishment of fully equipped hospital with state of the art ophthalmological units (Albasar International Foundation 2012a, 2012b, 2012c).

King Faisal Foundation

The King Faisal Foundation (KFF) is a Saudi Foundation established in 1976 in the name of the late King Faisal with the aim of sustaining education, scholarship and research at the national, regional and global levels (King Faisal Foundation 2014). The organisation runs a portfolio of schools (King Faisal schools), scholarships (for students of its schools as well as of the Alfaisal University, of the Effat University and of the Prince Sultan college), and organises the King Faisal International Prize. No detailed accounts of spending in relation to projects run are available. Within Europe, the KFF reportedly runs 11 philanthropic projects and European students receive 5.7per cent of scholarships not destined to

Saudis students. For the purpose of this study it is worth mentioning that overall, only 4.5per cent of students benefitting from a scholarship are enrolled in Islamic and Shari'a studies at any institution.

Hussein Abdulatif Charity Foundation

Saudi charity organisation based in the city of Mecca established by Sheikh Hussein Abdulatif Muhammad Hussein Abdulatif. The organisation appears to be actively assisting families and women through social assistance and development projects (Hussein Abdulatif Charity Foundation 2014a, 2014b, 2014c). No further information relevant to the purpose of this study could be identified.

B.5. United Arab Emirates

B.5.1 State Institutions

Ministry of Social Affairs

The Ministry of Social Affairs is one of the UAE federal institutions whose work most closely relates to the scope of this study due to its mission in the fields of social rights, community inclusion, social cohesion, and social responsibility (Ministry of Social Affairs 2014c, 2014d). As a consequence, the Ministry of Social Affairs acts as the primary regulator of public welfare societies (i.e. charity organisation and foundations) throughout the UAE (see below). However, notwithstanding federal laws and regulations applying to public welfare societies, a review of the ministry's website, publications and available datasets did not present information relevant to the scope of this study (Ministry of Social Affairs 2014a, 2014b).

Ministry of International Cooperation and Development

The Ministry of International Cooperation and Development (MICAD) was established in March 2013 and replaced the Office for the Coordination of Foreign Aid (OCFA) established in 2008 (The International Programme of the Chariy Commision 2014, MICAD homepage 2014). The MICAD's mission is to enhance the UAE's regional and international profile in the fields of international development and aid disbursement. To achieve this goal and to maximise the impact of the country's foreign assistance, the MICAD oversees and coordinates the country's foreign-aid strategy in accordance with the core values of transparency, accountability, excellence, creativity and commitment (MICAD 2014a).

In accordance to its values of transparency and accountability, the MICAD devised a national foreign aid reporting framework which is linked to other reporting frameworks established by international organisations, but maintains an original and broader scope (MICAD 2013a). In particular, the framework devised by the MICAD allows the ministry to report the country's flow of aid in accordance to the Development Assistance Committee (DAC) of the Organisation of Economic Co-operation and Development (OECD) and the United Nations FTS formats. However, the formats focus exclusively on aid destined to low-income countries in the field of social development. At the same time, the MICAD's framework retains a broader focus of attention accounting for flows of aid otherwise not monitored by international organisations. In particular, the MICAD collaborates and monitors not only governmental institutions, foundations and funds, but also humanitarian and charitable non-governmental organisations as well as individuals and private-sector entities providing foreign aid. The MICAD defines foreign aid as assistance provided by a registered entity in three categories: development aid, humanitarian aid and charity aid. Development aid refers to aid aiming at improving the economic and social welfare of the recipient (e.g. state's budgetary support or the construction of roads, hospitals, etc.). Humanitarian aid refers to assistance provided to help populations going through humanitarian emergencies, displacement, refugee status etc. Lastly, the Charity aid category encompasses aid disbursed with the aim of providing cultural or religious support by activities such as building mosques, supporting Hajj pilgrims, providing seasonal Ramadan programmes, etc (MICAD 2013a).

The MICAD collects data from monitored bodies during annual cycles and presents its findings through publicly available annual reports. Information received is then collated and analysed by the MICAD. Furthermore, the process by which data is collated, classified and analysed undergoes a quality-control process carried out by KMPG. All of the MICAD's and OCFA's annual reports reviewed maintain a similar structure in that they present an overview of the methodology used for preparing the report, a review of projects carried out in the main recipients of UAE aid, and a review of the projects and activities of the main UAE donors monitored by the ministry. At the time of writing, the latest currently available report was that accounting for foreign aid disbursed in 2012 that was issued in October 2013 (MICAD 2013, 2014f, OCFA 2010, 2011, 2012).[34]

A review of MICAD's and OCFA's annual reports highlighted several information relevant to the scope of this study. According to the 2009 OCFA annual report, the Netherlands were a recipient of aid coming from the UAE for AED 1,989,371. The entirety of this aid was disbursed by the Al Maktoum Foundation, making the Netherlands the third largest European recipient of aid from this foundation in that year after Ireland and the United Kingdom. Although no further details are available in the report as to the sector or projects to which these funds were destined, it is specified that they were mostly employed for 'social infrastructures projects.' (OCFA 2010, 47-48). In 2010, the OCFA annual report indicates that although Europe as a whole was the recipient of funds coming from the UAE for approximately AED 124,767,927, no aid was destined to the Netherlands by any of the monitored organisations, bodies and groups (OCFA 2011, 105-106). The 2011 OCFA report indicates that the Netherlands were the recipient of aid worth AED 1,167,581, the entirety of this fund was again provided by the Al Maktoum Foundation for projects listed as part of the 'Charity' category (see above). The report further adds that during the year 2011 the Al Maktoum Foundation launched the Essalam Mosque in Rotterdam which was believed to be the largest in Western Europe and 'offers space for 2,200 worshipper and aims to spread the teachings of Islam, with an emphasis on tolerance.' (OCFA 2012, 78-79, 104-113). Lastly, the 2012 MICAD annual report indicated the Netherlands as a recipient of aid in the 'Charity' category for AED 1,977,682 which were once again fully provided by the Al Maktoum Foundation. These funds were reportedly destined to cover the core budget, as well as other projects (e.g. Iftar meals and support for individuals wishing to go on the Hajj pilgrimage) of the Essalam Mosque in Rotterdam (MICAD 201,: 108-109, 160-171).

The MICAD issues also a monthly newsletter called 'Musa'adat' which is retrospectively available from April 2011 through the ministry website (MICAD 2014d). No further information relevant to the scope of this study was identified through the newsletter issues. The MICAD further publishes through its website infographics ad maps relating to the aid disbursement of the main donors it monitors and to UAE funded activities in humanitarian crisis (MICAD 2014b). Lastly, the ministry website maintains a record of news updates, minister speeches and other publications concerning strategies and programmes devised by the ministry (MICAD 2014c, 2014e).

[34] Reports issued before MICAD's establishment were prepared by its predecessor, the UAE Office for the Coordination of Foreign Aid (OCFA) which was presided by HH Sheikh Hamdan Bin Zayed al Nahyan.

General Authority for Islamic Affairs and Endowments

The General Authority for Islamic Affairs and Endowments (GAIAE) represents the main federal authority administering Islamic affairs (e.g. mosques administration, Ifta' services, Hajj and 'Umrah affairs, Dawah activities, etc.) and Islamic endowments in the UAE (GAIAE 2014a). The authority was established by virtue of Law No. 34/2006 issued by the UAE President, HH Sheikh Khalifa bin Zayed Al Nahyan. The GAIAE reports directly to the Cabinet about its work through periodic reports. After a review of available materials through the authority's website, it appears that this body is mostly active within the UAE. The GAIAE, in fact, is responsible for the organisation of Hajj for Emirati citizens, the provision of Khutba services within the country (thematic guidelines, monitoring, etc.), the implementation of a nation-wide unified Adhan, the management and development of Quran memorisation centres, the construction of mosques, the daily governance of other UAE religious institutions, the development of awareness campaign regarding different religious issues (e.g. *Waqf*), liaising with Awqaf and Hajj-specific bodies in the GCC region and Islamic world at large, and the running of the national Fatwa Center (working in Arabic, English, and Urdu). Lastly, the GAIAE has several endowments projects within its portfolio, including shopping centres in Dubai and al-Ain, and other commercial buildings in Sharjah and al-Fujarah.

Islamic Affairs & Charitable Activities Department

The Islamic Affairs and Charitable Activities department (IACAD) is the department responsible for the administration of Islamic affairs and charitable activities in the Emirate of Dubai. The body was first established in 1969, but its powers and functions were last defined by Law No. 2/2011 issued by the Prime Minister of the UAE, HH Shaikh Mohammed bin Rashid Al Maktoum (IACAD 2014a). Regarding the administration of Islamic affairs and the construction and licensing of mosques, the IACAD is active within the boundaries of the Emirate of Dubai and does not appear to be active with mosque construction projects or management abroad (IACAD 2014c). Furthermore, the IACAD assists the federal Ministry of Social Affairs in its regulatory work of welfare societies. In particular, the IACAD complements the work of the MICAD and maintains a record and overview of charities active within the Emirate of Dubai. The list of currently licensed charities in the Emirate of Dubai includes: Mohamed bin Rashid Charitable Humanitarian Foundation; Al Maktoum Foundation; Emirates Red Crescent; Dar al-Ber Society; Dubai Charity Association; Beit Al Khair Society; Al-Shifa Charity Establishment; Dubai Islamic Bank Humanitarian Foundation; Dubai Foundation for Women and Children; Khalaf Ahmad al-Habtoor Foundation; Jam'ia Al Islah Wa Al Taujih Al Ijtimahi - Relief Agency; Easa Saleh Al Gurg Charity Foundation; Al Barakah Charitable Society; Mohammad Omar Bin Haider Charity Establishment; Noor Dubai Foundation; Dubai Cares; Emirates Airline Foundation; Trahim Foundation; Majid al-Futtaim Charity Foundation (IACAD 2014d, 2014g). For a review of each charity individually see below.

The IACAD website offers also a number of periodic and sporadic publications. The 'Dubai Sun' and 'al-Deyaa Magazine' represent two periodic publications, in English and Arabic respectively, focusing on the discussion of issues relating to religion and the broader Islamic culture and civilisation. Lastly, the IACAD distributes through its website publications aiming to present Islam-related concepts and issues to

Muslims and new converts. No information relevant to this study was identified by reviewing the magazines' issues available through the IACAD website (IACAD 2014f).

International Humanitarian City

The International Humanitarian City (IHC) represents a logistic hub established in the Emirate of Dubai through Law No. 6/2007 and further regulated by Law No. 1/2012. The IHC aims to provide international humanitarian actors with logistics infrastructures, value-added services, and administrative support for the undertaking of their activities on the international stage (IHC 2013a, 2013d). The IHC counts among its members several United Nations agencies and provides on its website a page tracking all of the shipments and transactions undertaken through its services since its foundation (IHC 2013b, 2013c). No relevant information for this study could be identified through the review of available materials.

Zakat Fund

The Zakat Fund is the UAE's independent federal authority specialised in Zakat affairs which was established by Law No. 4/2003. The authority is tasked with raising societal awareness of the concept of Zakat and increasing the effectiveness of UAE's Zakat for the benefit and development of society (Zakat Fund 2014i, 2014j). As other Zakat funds, the Emirati Zakat Fund offers various services for the calculation of Zakat and for its payment. A review of projects and strategic documents available through the authority's website did not present any information relevant to the scope of this study. Through a number of programmes, the Zakat Fund redistributes Zakat payments received during the year to deserving individuals: orphans; low-income families; families of imprisoned individuals; families of indebted migrants residing in the UAE; families of unemployed individuals (Zakat Fund 2014c, 2014d, 2014e, 2014f, 2014g). A project aiming to support new Muslim converts is run by the fund, but only to the benefits of individuals residing within the UAE (Zakat Fund 2014h). Quarterly reports detailing Zakat payments received and how they were used are available on the authority website on an inconsistent basis (Zakat Fund 2012a, 2012b, 2012c, 2012d, 2013a, 2013b). The Zakat Fund lists on its website a list of partner charities including the Red Crescent Authority, Beit Al Khair, Dubai Charity Association, Mohammed Bin Rashid Charity, Sharjah Charity Association, Fujarah Welfare Association, Al Ihsan Charity, and Hamid Bin Rashid Charity (see below for individual charities reviews) (Zakat Fund 2014b).

Box B.5: Overview of laws regulating charities

The licensing of public welfare societies in the UAE is regulated by Federal Law No. 2/2008 issued by the UAE President, HH Khalifa Bin Zayed Al Nahyan, which replaced Law No. 6/1974 (Ministry of Social Affairs 2008). The Ministry of Social Affairs is responsible for the implementation of regulatory provisions outlined in the law which comprise the establishment, registration, management and dissolution of public welfare societies.

The 'Preamble Chapter' of Law No. 2/2008 outlines a series of requirements to be met and documents to be provided by the charity in order to be registered by the ministry (Ministry of Social Affairs 2008). Before a public welfare society can begin its operation, it must establish an interim committee and submit a registration application which will then be reviewed by the ministry within sixty days. According to Article 4.7 and 6 of the law, the registration application should contain documentation comprising, among other documents, the society's articles of

association. Articles of association should contain details about the society's mission and objectives as well as about its resources and manners for utilising them and controlling their spending. Furthermore, Article 16 stipulates that societies may not deviate from the objectives outlined in their articles of association and that they may not engage in politics or matters that impair the State security, nor arouse sectarian, racial or religious disputes (Ministry of Social Affairs 2008). In case of rejection, the interim committee trying to register the society has a right to file a grievance with the ministry within 180 days from the reception of the notice of rejection. With regards to international activities, articles 17 and 18 of the law grant societies the right to associate and engage with foreign based or international organisations, forums, assemblies, conferences as well as that of hosting foreigners at their events and activities, provided they previously obtained a license to do so from the ministry (Ministry of Social Affairs 2008). Article 20 and Chapter 3 of the law outline regulatory dispositions with regards to financial matters and their monitoring by the ministry. Societies are subject to the monitoring of the ministry which verifies expenditures and the safe allocation of resources for purposes and projects comprised by the previously accepted articles of association. Furthermore, societies must deposit cash funds in national banks in the UAE and notify banking details to the ministry. Societies must also provide the ministry with a copy of the final account of the previous year and the budget draft of the year ahead within 15 days from their approval by the societies' general assemblies. The final balance should account for all donations, gifts, wills and subsidies received by the societies. Article 43 prohibits non-licensed societies from carrying out fundraising activities as well as to accept donations, gifts, wills or subsidies prior to the obtaining of a license from the ministry. Article 57 prescribes the confiscation of any fund obtained by societies without a license (Ministry of Social Affairs 2008).

In addition to Law No. 2/2008 and the regulatory activities performed by the Ministry of Social Affairs at the federal level, the IACAD and its Resolution No. 12/2006 further complement and regulate the activities and licensing of religious and charitable societies active within the Emirate of Dubai (IACAD 2006). Resolution No. 12/2006 effectively complements Law No. 2/2008 whilst recognising the hierarchic supremacy of the Ministry over the IACAD, especially with regards to the licensing of newly established societies (IACAD 2006). Dispositions contained in this regulation largely mirror those present in Law No. 2/008, especially with regards to the registration, licensing, financial accounting and dissolution of societies (IACAD 2006). Additionally, Article 38 of Resolution No. 12/2006 prescribes the verification and auditing of each society financial accounting by the IACAD (IACAD 2006). Rules outlined in this Resolution apply also to previously registered societies looking to open an additional branch in the Emirate of Dubai. All of the above regulations do not apply to organisations active within the IHC as long as they do not intend to fundraise or carry out work within the UAE (The International Programme of the Charity Commission 2014).

B.5.2 State Licensed Charities and Foundations

Mohamed bin Rashid Charitable Humanitarian Foundation

The website of this foundation was not accessible at the moment of writing.[35] The foundation was established in 1997 and it is mainly active in the fields of health care and education by providing assistance to low-income and disadvantaged families, with no distinction made according to ethnicity or religion (SheikhMohammed.com 2014, Twitter 2014, Youtube 2012a, 2012b). The foundation operates both within the UAE and abroad, but no reference to projects relevant to the scope of this study could be further identified.

---

[35] See as of 3 December 2014 http://www.mcharity.org/

Al Maktoum Foundation

The Al Maktoum Foundation was established in 2007 by HH Sheikh Mohammed Bin Rashid Al Maktoum and is one of the charities registered through the IACAD (IACAD 2014g, MBRF Foundation 2014). According to the organisation website, the Al Maktoum Foundation is mostly concerned with knowledge dissemination and advancement, particularly within the UAE and surrounding Middle Eastern region. To achieve these goals, the foundation runs national and international programmes such as the translation and distribution of books in Arabic among Emirati families, the translation and summarisation of leading international books in Arabic freely distributed through the organisation's website, the preparation in cooperation with the UN of the Arabic Knowledge Report and the organisation of literary and poetic courses and competitions (MBRF 2014a, 2014c, 2014d, 2014d, 2014e 2014f, 2014g, 2014h). The foundation publishes also periodic magazines in both English and Arabic touching on knowledge and development related topics. Even though information about the financing of the Al Salaam Mosque in Rotterdam by the Al Maktoum Foundation is available through the MICAD website, no further relevant information on this or other mosque and Islamic centres building projects could be identified through the organisation's website.

Emirates Red Crescent

This organisation represents the Emirati section of the international humanitarian organisation 'Red Crescent'. The Emirati branch was founded in 1983 and registered in the Emirate of Dubai before obtaining the international recognition as member No. 139 of the International Federation of the Red Crescent and Red Cross in 1986 (Emirates Red Crescent 2013b, 2013c). esides its activities in the field of humanitarian relief and assistance in countries struck by natural disasters or conflicts, the Emirates Red Crescent is also active in the field of reconstruction and maintenance of social infrastructures including: wells, residential buildings, and mosques. Projects relating to the field of social infrastructures construction are so far limited to the following countries: Afghanistan, Palestine, Yemen, Pakistan, Sudan, Lebanon, Syria, Sri Lanka, and Maldives (Emirates Red Crescent 2013a). Interestingly, among its promotional videos, the Emirati Red Crescent's website presents a cartoon encouraging donors to give donations for mosques building projects to well established and recognised charities rather than to unaccountable ones (Emirates Red Crescent 2014).

Dar Al Ber Society

The Dar Al Ber Society is a charity organisation which was established in 1978 in the Emirate of Dubai and which operates in the field of religious assistance and da'wah activities (Dar Al Ber Society 2014a). The charity encourages the development and diffusion of Islamic teaching centres as well as Quran memorisation centres. Furthermore, the organisation is active in producing and distributing books and materials covering different religious issues and topics both in printing and through its website (Dar Al Ber Society 2014a). A review of materials available through the organisation website, however, did not highlight further information relevant to the scope of this study.

Dubai Charity Association

This charity association was established in the Emirate of Dubai in 1994 and has been active since, both in the UAE and abroad, with projects focusing on the provision of religious assistance (e.g. endowments projects, Ramadan seasonal projects, provision of Eid sacrifices, Zakat collection) (Dubai Charity Association 2008, 2014). The charity is also active in the construction of mosques and Islamic centres. A review of available documents underlined that, while the vast majority of its projects have so far been carried out in Africa and Asia, a handful of mosque construction and education projects were also funded in Albania and Estonia (Dubai Charity Association, n.d., Emirates Charity 2014). No further information relevant to the scope of this study could be identified.

Beit Al Khair Society

The Beit Al Khair charity was established in 1989 by a group of Emirati businessmen and is now registered in the Emirate of Dubai through the IACAD (Beit Al Khair 2014a). Beit Al Khair is active across several fields, including education, health, social infrastructures and religious assistance. However, this charity operates only within the UAE (Beit Al Khair 2014b, 2014d, 2014e). The organisation has carried out several joint cooperation and funding activities with other UAE-based charities (Beit Al Khair 2014c).

Al-Shifa Charity Establishment

The Al Shifa Cahrity Establishment is an organisation registered through the IACAD which specialises in the field of medical assistance. At the moment of review, it was not possible to identify an official website for this organisation. A review of news articles referring to the Al-Shifa Charity Establishment highlighted the role of this charity in the field of medical and humanitarian assistance, particularly in the governorate of Hadramaut, Yemen (Dar al-Shifa' 2014, Honahadhramout.com 20141, 2014b, Petro Masila 2014, Sayun.info 2011).

Dubai Islamic Bank Humanitarian Foundation

Humanitarian foundation associated with the Dubai Islamic Bank and licensed by the IACAD. At the time of writing this report, the research team was unable to identify an official organisation website (IACAD 2014e). A review of publicly available sources and news items about the DIB foundation highlighted the organisation's role as a donor of funds to other charities and Zakat funds based in the UAE (Arabs Today 2014, Addustour 2014, Beit al-Khair Society 2014, Emirates 24/7 2012, SheykhMohammed.co.ae). No further information relevant for the purpose of this study could be identified.

Dubai Foundation for Women and Children

Non-profit organisation established in 2007 to offer sheltering and protection to women and children victims of human trafficking and different types of abuses (Dubai Foundation for Women and Children 2009). A review of publicly available annual reports and publications did not highlight any further information relevant to the scope of this study.

Khalaf Ahmad Al Habtoor Foundation

At the time of writing this report, the official website of this charity was currently under construction.[36] The foundation was established in 2013 in the Emirate of Dubai and aims to promote scientific progress, dialogue between religions and civilisations as well as to run humanitarian relief, social assistance and social development programmes, both inside and outside the UAE (Al Bayan 2013, Al Ittihad 2013). With regards to mosques and Islamic centres building, records projects carried out in Albania have emerged of, but no further information relevant to this study was identified by the research team (Al Habtoor 2014).

Jam'ia Al Islah Wa Al Taujih Al Ijtimahi –Relief Agency

This agency represents the charity branch of the 'Organisation for Reform and Social Direction' (Islah) which was established in 1974 in the UAE. The charity branch of Islah was reportedly established in 1987 and was active since its establishment in the field of religious education and proselytism (Aleslaah 2011a, 2011b). However, due to the broad organisation's reported alignment with the international Muslim Brotherhood organisation, recent report indicate that the broad Islah organisation had been listed as a 'terrorist organisation' by the UAE cabinet (WAM 2014).

Easa Saleh Al Gurg Charity Foundation

The Easa Saleh Al Gurg Charity Foundation was established in 2010 in the Emirate of Dubai with the intention of undertaking aid activities in the fields of humanitarian and cultural assistance, both across the UAE and abroad. The research team was unable to identify an official organisational website for this foundation (IACAD 2014). According to news sources, this charity has recently agreed to finance scholarships in the field of Shari'a and Islamic studies at the University of Sharjah for both UAE nationals and students hailing from countries in the surrounding region (Al Ittihad 2010, University of Sharjah 2013).

Al Barakah Charitable Society

The research team was unable to identify an official website for this charity. No additional information could be identified through ad hoc internet searches focusing on this charity's name.

Mohammad Omar Bin Haider Charity Establishment

The website of this charity establishment was not accessible at the time of writing this report.[37] The charity is registered and licensed by the IACAD, but after a review of publicly available sources it appears to be active only inside the UAE (Al Bayan 2011).

---

[36] See Khalaf Ahmad al-Habtoor Foundation website as of 7 November 2014: http://www.kahfoundation.org/

[37] See Mohammad Omar Bin Haider Charity Establishment website as of 7 November 2014: http://www.mobh.group.com/

Noor Dubai Foundation

The Noor Dubai Foundation is a humanitarian organisation founded in 2008 by HH Sheikh Mohammed bin Rashid Al Maktoum and licensed by the IACAD. The Noor Dubai Foundation runs programmes aiming to raise awareness of, prevent and cure visual disabilities in low income countries (Noor Dubai Foundation 2011). No further relevant information for the purpose of this study could be identified.

Dubai Cares

Dubai Cares is a foundation established in 2007 and registered with the IACAD. This foundation runs aid programmes in the field of education with the aim of providing access to quality primary education to children of disadvantaged communities regardless of their ethnicity or religious background. At present, Dubai Cares programmes span across 35 low income countries, but available information indicates that they are not relevant for the purpose of this study (Dubai Cares 2014a, 2014b, 2014c).

The Emirates Airline Foundation

This non-profit charity organisation was established by Emirates Airline with the aim of improving the quality of life of children, regardless of their geographical location, gender, ethnicity or religion (The Emirates Airline Foundation 2014a). The foundation runs health, housing, education and food related programmes, mostly in low-income countries (The Emirates Airline Foundation 2014b, 2014c). No further information relevant to this study could be identified by the research team.

Trahim Foundation

The website of this foundation was not accessible at the time of writing this report (Trahim Foundation homepage 2014). A review of articles concerning the foundation (Al Bayan 2012) highlighted its efforts in the fields of assistance to low income families through the provision of various services (e.g. provision of food and clothing, construction and restoration of housing units). The foundation was established in 2012 in the Emirate of Dubai and is active both inside and outside the UAE. No further information relevant to the scope of this study could be identified.

Majid Al Futtaim Charity Foundation

This foundation represents the non-profit arm of the Majid Al Futtaim Group and was established in 2007 in the Emirate of Dubai (Majid al-Futtaim Charity Foundation 2011a). The Majid Al Futtaim Charity Foundation is mostly active in the fields of education and healthcare through awareness campaigns and through the provision of training, equipment and facilities to practitioners and existing institutions in said fields (e.g. dialysis units, neonatal intensive care units, etc.). In the cultural and religious sphere, the charity runs a series of Ramadan programmes aimed at providing meals and assistance to people in need, but only within the UAE (Majid al-Futtaim Charity Foundation 2011b). No further information relevant to the scope of this study could be identified.

Zayed Bin Sultan Al-Nahayan Charitable and Humanitarian Foundation

The Zayed Bin Sultan Al-Nahayan Charitable and Humanitarian Foundation was established in 1992 by HH Sheikh Zayed bin Sultan Al-Nahayan with the goal of carrying out humanitarian work outside of the UAE in the fields of education, health, humanitarian relief and cultural assistance (Zayed Bin Sultan Al-Nahayan Charitable and Humanitarian Foundation 2014a, 2014b). With regards to cultural assistance, besides publishing texts focusing on topics related to the Islamic religion and Arab civilisation, this charity has previously been active in the fields of mosque and Islamic centres building. However, even though the charity has a track record for this type of activities within Europe, no further details referring to the Netherlands could be identified (Zayed Bin Sultan Al-Nahayan Charitable and Humanitarian Foundation 2014a, 2014b).

Khalifa Bin Zayed Al Nahyan Foundation

The Khalifa Bin Zayed Al Nahyan Foundation is a charity which was established by virtue of Law No.20/2007 promulgated by HH Khalifa Bin Zayed Al Nahyan (Khalifa Bin Zayed Al Nahyan Foundation 2014d). Since its inception, the charity has operated in more than 35 countries, providing aid in the fields of education, health, humanitarian relief, religious assistance and development of social infrastructures (Khalifa Bin Zayed Al Nahyan Foundation 2014a, 2014b). Activities in the field of social infrastructures included the construction and restoration of mosques and Islamic centres also in European countries (Khalifa Bin Zayed Al Nahyan Foundation 2014c). No further information relevant to the scope of this study could be identified.

Ewa'a Shelters for Women and Children

This organisation is active across the UAE and aims to protect women and children victim of human trafficking and other types of abuse (Ewa'a Shelters for Women and Children 2010). No information relevant to the scope of this study could be identified.

Ras Al Khaimah Charity Association

Charity association established with Emiri Decree No. 12/2004 in the Emirate of Ras Al Khaimah. The research team was unable to identify an official website for this organisation. A review of public sources and news relating to the Ras Al Khaimah Charity Association evidenced that the organisation is still active and recently acquired a substantial land donation from the Emir of Ras Al Khaimah to develop an endowment in the form of a mall. (Al-Bayan 2014, al-Iqtisadiyy 2013, Beit al-Khair , n.d., Emarat al-Youm 2014). No further projects or information relevant to the scope of this research could be identified.

Al Rahma Charity

This charity organisation was founded in 1988 and was known by the name of 'Committee for Zakat and Sadaqa' until 2004. The organisation is based in the Emirate of Ras Al Khaima and works across several fields, including: social development, mosques construction, education and religious assistance (Al Rahma 2014a, 2014b). The organisation is active abroad in the field of mosques construction and lists among its achievements the completion of more than 450 mosques in both Indonesia and Bangladesh, as well as the

construction of mosques, even though to a lesser extent, in Burma, Thailand, Pakistan, Somalia, Uganda, Afghanistan, Ethiopia and the UAE (Al Rahma 2013a, 2013b).

Foundation of Saqr Mohammed Al Qasimi For Charity

The Foundation of Saqr Mohammed Al Qasimi For Charity is a charity organisation located in the Emirate of Ras Al Khaimah. The organisation is active across several fields including education, social development, and religious assistance (e.g. Hajj and 'Umrah provision, refurbishment of mosques, etc.) (Saqr Chairty 2014a). However, after a review of the organisation's website, it appears that this charity institution is active at the international level only with projects providing humanitarian relief to populations hit by natural disasters (Saqr Chairty 2014b).

Humaid bin Rashid Al Nouimi Foundation

Charity organisation established with Decree No. 4/2000 by the Emir of Ajman, Sheykh Humaid bin Rashid Al Nouimi. The organisation appears to operate only at the local level through a number of social assistance and social infrastructure maintenance projects aiming to assist eligible citizen families (Humaid Bin Rashid Al Nouimi Foundation 2013a, 2013b, 2013c). The only charity's programmes relating to the religious sphere identified through a review of materials available on the charity's website are seasonal Ramadan and Eid projects for the provision of Iftar meals, clothing, and sacrifices (Humaid Bin Rashid Al Nouimi Foundation 2013c).

Human Appeal International

Human Appeal International (HAI) is a humanitarian organisation based in the Emirate of Ajman. Although the organisation is active at the international level, its work focuses prevalently on the fields of urgent humanitarian relief, healthcare, education and social development (HAI 2010a, 2010b, 2010c). With regards to the religious sphere, HAI runs a few national and international programmes for the provision of Ramadan meals and assistance, as well as mosque building and renovation projects. A few international projects aiming at the construction of mosques have been reportedly carried out in Sudan, Senegal, Niger, Somalia, Indonesia, India, Jordan, Kyrgyzstan, Sudan, Kosovo and Bosnia (HAI 2010b). No further relevant information for the purpose of this study could be identified.

Al Ihsan Charity Association

The Al Ihsan Charity Association was founded in 1990 through individual efforts and then officially recognised by the Emir of Ajman in 1998 (Al Ihsan Charity Association 2014a). The organisation is active in multiple fields, including: education, healthcare, assistance to orphans, development programmes for women, and investment and management of endowments. The organisation has also a track record for operating abroad in the field of mosques construction, but reportedly only in Somalia, Bangladesh and Indonesia (Al Ihsan Charity Association 2014). No additional information relevant to the scope of this study could be identified.

Sharjah Charity House

The Sharjah Charity House is an organisation established in 1996 in the Emirate of Sharjah (Sharjah Charity House homepage 2014). This organisation is active with humanitarian relief, developmental,

religious and cultural programmes both within the UAE and abroad. Through the charity website it was possible to identify a few annual reports, the latest of which presented an overview of work for the year 2014. Issues from a periodic publication called 'Nashra' were also available through the charity website. Although the charity is very actively involved in mosques construction projects abroad, no relevant projects referring to the Netherlands could be identified. However, one of the Nashra issues available highlighted the involvement of the organisation in the financing and construction of the al-Muhajirin Islamic Centre in Bonn, Germany. The project's financing was reportedly covered by the organisation's President of the Board of Trustees and the inauguration event was attended by representatives from the local UAE embassy.

Sharjah Charity International

Sharjah Charity International is a charity organisation which was founded through Decree No. 1/1989 of the Emir of Sharjah (Sharjah Charity International homepage 2014). A review of the charity's website showed that this organisation runs programmes aimed at mosques and Islamic centres building both inside and outside of the UAE. However, no relevant organisational publications were available at the moment of review and no projects or further information emerged with regards to mosques building projects in the Netherlands. The organisation also runs in conjunction with UAE Embassies, various Iftar Meals programs during the month of Ramadan; these projects reportedly involve European countries as well (al-Khaleej 2014, Emarat al-youm 2013).

Fujarah Welfare Association

The Fujarah Welfare Association was established in 1987 with the sponsorship of the Emir of Fujarah. The organisation appears to be active, both within the UAE and abroad, across various fields, including: humanitarian relief, education, healthcare, social infrastructures projects, religious programmes, and assistance to families (Fujarah Welfare Association 200). With regards to religious programmes, the Fujarah Welfare Association has a track record of mosques construction projects, as well as of delivering seasonal Ramadan programmes (e.g. Iftar meals, clothing), but no specific details over which country were involved by said projects could be identified (Fujarah Welfare Association 2009). A review of the organisation's website highlighted a lack of publications or detailed accounts of projects undertaken by the charity.

Umm Al Quwain Charity Association

The research team was unable to identify an official website for the Umm Al Quwain Charity Association. A review of available news article and public sources indicates that the Umm Al Quwain charity is active in the fields of social assistance and humanitarian relief, both within the UAE and abroad (Khalifa bin Zayed al Nayahn Foundation, n.d., al-Khaleej 2012, Umm al-Quwain 2014a, 2014b, 2014c). No further information relevant to the scope of this study could be identified.

Appendix C: List of interviewees and consulted individuals

This appendix lists the individuals interviewed or otherwise consulted as part of this study. Those who consented have been named in alphabetical order; others have been anonymised by function and affiliation.

Table C.1. List of interviewees

Name	Institution	Date(s)
Habib Ahmed	Durham University	11-Sep-14
Rasit Bal	Contactorgaan Moslim en Overheid	16-Dec-14
René Bekkers	Center for Philanthropic Studies, VU University Amsterdam	28-Aug-14
Dick Blommesteijn	Tax Authorities (*Belastingdienst*)	31-Jul-14
Welmoet Boender	Utrecht University	Email correspondence
Reneko Elema	NL Ministry of Foreign Affairs	23-Oct-14
Adri Kemps	Former International Committee on Fundraising Organizations (ICFO) and former *Centraal Bureau Fondsenwerving* (CBF)	11-Jan-15
Nico Landman	Utrecht University	09-Sep-14 Email correspondence
Joris Rijbroek	NL Ministry of Social Affairs and Employment	07-Aug-14
Jan Hein Schüssel	Ministry of Security and Justice	Email correspondence
Antonio Vicedomini	Douane	21-Aug-14
Lorenzo Vidino	Italian Institute for International Political Studies	30-Oct-14
Hans Visser	VU University Amsterdam	28-Aug-14 Email correspondence
Noor Witteveen	Financieel Expertise Centrum (FEC)	02-Dec-14
Senior Intelligence Advisor	AIVD	09-Sep-14
Diplomat	Netherlands Embassy in Kuwait	Email correspondence

Name	Institution	Date(s)
Senior representative	Financial Intelligence Unit (FIU)	30-Jun-14 09-Sep-14
Senior Representative	Tax Authorities (*Belastingdienst*)	08-Aug-14
Senior Representative	Tax Authorities (*Belastingdienst*)	08-Aug-14